

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW YORK

CRIMINAL AND CIVIL  
DOCKET CASE

UNDER THE

U.S. DISTRICT COURT  
N.D. OF N.Y.  
FILED  
AUG 19 2011  
LAWRENCE BAERMAN, CLERK  
ALBANY

ROBERT E ZORN ( PLAINTIFF,MANDATOR)

vs

the STATE of Vermont

THE UNITED STATES OF AMERICA

1:11-CV-0985  
(GTS/DRH)

THE STATE OF VERMONT, VERMONT STATE POLICE  
TROOPER RIDER, TROOPER DANIELI  
TROOPER EDWARD HUNTER, JOEL DAVIDSON, TROOPER PERKINS  
THE STATE OF VERMONT TOWNS OF PLYMOUTH, KILLINGTON,

MIDDLETOWN SPRINGS, VERMONT

THE UNITED STATES JUSTICES

FOR THE UNITED STATES DISTRICT COURT FOR THE DISTRICT

OF VERMONT CHEIF JUSTICE CHRISTINA REISS

CHRISTINA REISS, WILLIAM SESSIONS THE THIRD, J GARVAN MURTHA  
JUDGE J GARVAN MURTHA, WILLIAM SESSIONS THE THIRD

JEROME NIEDERMIER, AND THE CLERKS AND DEPUTY CLERKS

OF THE UNITED STATES DISTRICT COURT

*The State of Vermont Supreme Court Justices ET AL*  
THE STATE OF VERMONT RUTLAND COUNTY SUPERIOR COURT

JUDGES MARY MILES TEACHOUT, THERESA DIMAURO

JUDGEE MARTIN,  
STATE OF VERMONT

RUTLAND COURTE PROBATE COUYRT JUSTICE

KEVIN CANDON

STATE OF VERMONT

WASHINGTON COUNTY SUPERIOR COURT JUDGE GEOFFREY CRAWFORD

GEOFFREY CRAWFORD

THE STATE OF VERMONT WASHINGTON COUNTY PROBATE COURT JUSTICE  
GEORGE BELCHER

THE STATE OF VERMONT HOSPITAL

DOCTOR PAUL COTTON M.D. P.C.

DOCTOR DUNCANE, DOCTOR MUNSON  
CARE OF THE VERMONT STATE HOSPITAL

DOCTOR LINDER

THE STATE OF VERMONT ATTORNEY GENERAL WILLIAM SORRELL  
ET AL STAFF ATTORNEYS

THE RUTLAND HERALD NEW PAPER

SARAH BEARD RUTLAND COUNTY SCREENER

THE STATE OF VERMONT RUTLAND COUNTY STATE ATTORNEY MARC B.  
BRIERE  
ERNEST ALLEN 111 95 saint paul street BURLINGTON VT 05401

ARTUR B ZORN  
347 loomis street montpelier VERMONT 05601

CHARITY DOWNS,  
TRACEE A OAKMAN RUPE

PURSUANT OF THE STATE ACTIONS SUBSTITUTION OF PARTIES  
IN WHICH THE STATE OF VERMONT DEPARTMENT OF TAXES CONVEYED TITLE  
THE STATE OF VERMONT SUBSTITUTED THE PARTYS IN THE STATE  
OF VERMONT WASHINGTON COUNTY SUPERIOR COURT

THEREFORE THE SERVICE TO THESE PARTIES ET

IS BEING MADE TO THE STATE OF VERMONT ATTORNEY  
GENERAL WILLIAM SORRELL  
AND FOR THE JUSTICES AND COUNTIES  
FOR ALL STATE AND PRIVATE SECTOR PERSONS

109 state street montpelier vermont 05609

THE UNITED STATES JUSTICES  
ET AL UNITED STATES PERSONS

NAMED AS INDIVIDUALS

SERVICE SENT TO THE UNITED STATES SOLICITOR GENERAL  
CARE OF THE UNITED STATES ATTORNEY GENERAL  
DEARMR HOLDER

950 penn ave N.W. WASHINGTON D.C 20530

james h jr ottway

JAMES H OTTAWAY JR  
10 WATCH HILL ROAD NEW PALTZ NEW YORK 12561

*ET AL Defendants  
and Co-defendants  
in all Related Cases*

1) SUMMONS AND COMPLAINT AGAINST THE STATE OF VERMONT  
AND ET AL PERSONS AND UNITED STATES OF AMERICA  
YOU ARE BEING CHARGED AND PROVEN UNDER THE UNCONTESTED FACTS  
OF THE FEDERAL AND INSTATE ACTIONS  
OF FALSIFYING FEDERAL AND INSTATE COURT ORDERS  
AS HABITUALLY OFFENDERS, RACKETEERING ACROSS STATE LINES  
ORGANIZED CRIME THROUGH CORRUPT POLITICAL PARTIES  
OBSTRUCTION OF JUSTICE FALSIFICATION HABITUALLY OF COURT  
ORDERS AND ALL PAST VIOLATIONS OF LAW  
PROFITING PRIVATE AND FEDERAL INSTATE PARTY MEMBERS AND OUT  
OF STATE PERSONS IN THE STATE OF NEW YORK  
CRIMINALLY UNDER THE FALSE CLAIMS ACT AND AS ACCESSORIES  
AND OR PRINCIPALS TO PRE-MEDITATED MURDER, AND THE FIRST  
DEGREE MURDER OF EDNA A ZORN, AND CONTINUOUS ATTEMPT  
TO MURDER ROBERT E ZORN WHICH UNDER THE HABITUAL OFFENDERS ACT  
OF RECIDIVIST CRIMINAL ACTS OF FALSIFICATION  
OF JUDICIAL RECORDS ACROSS STATE LINES  
DEFAMATION AGAINST THE RIGHTS OF LIFE LIBERTY  
AND PURSUIT OF HAPPINESS AGAINST ROBERT E ZORN  
CONSTITUTIONAL RIGHTS HABEAS CORPUS RIGHTS IRREPAIRABLY  
UNDER THE ANTI INJUNCTION ACT THE ALLEGED FEDERAL  
DEFENDANTS ARE NAMED AS INDIVIDUALS FALSIFYING JUDICIAL  
COURT ORDERS IN WHICH THE ACTIONS OF CHRISTINA REISS  
ATTACHED FALSIFY THE UNCONTESTED FACT THAT THE  
RIGHTS OF HABEAS CORPUS RIGHTS TO REDRESS  
AND FREEDOM OF SPEECH HAVE BEEN DENIED UNDER

B 3

THE ANTI INJUNCTION ACT IN WHICH THE STATE OF VERMONT  
THROUGH THE VERMONT SUPREME COURT FALSIFIED THE JUDICIAL AND  
PUBLIC RECORD HABITUALLY OF ALL RELATED CASE IN WHICH  
THE COURT THE U.S DISTRICT COURT FOR THE DISTRICT  
OF VERMONT JUSTICE REISS COULDN'T GRANT INJUNCTIVE RELIEF  
TO USE OF THE JUDICIARY OR THE INTERLOCUTORY *See attached order*  
APPEALS OF THE COURT ORDER UNDER STATE LAW OF HUMINSKI VS  
rutland county sheriffs department et  
order of the u.s c of appeals for the second circuit  
under equal protection of laws the 14th amendment rights  
of ROBERT E ZORN AFTER THE FACTS OF THE HABITUAL RECIDIVIST  
ACTIONS OF THE STATE OF VERMONT WITH THE PRIVATE  
SECTOR PERSONS AND PARTIES IN THE RELATED CASES  
FALSIFIED JUDICIAL RECORDS, IN WHICH CRIMINALLY  
indites CHRISTINA REISS AS A HABITUAL OFFENDER  
OF FALSIFYING THIS DECLARATORY DECREE  
AND COURT ORDERS SANCTIONED IN WHICH THE  
ACTIONS ARE FILED IN THE U.S DISTRICT COURT FOR THE  
DISTRICT OF NEW YORK  
THE DEFENDANTS ARE ALSO BEING SUED FOR  
PUNITIVE RELIEF FOR 135 million dollars  
per defendant and county and state of vermont

2) pursuant of the actions of the duties of the clerk

the clerk of the court  
FILED THE ACTIONS OF THE RESPONSE BACK TO ROBERT E ZORN  
NOT A COURT ORDER OR A ACTION OF THE JUDGE  
IN WHICH UNDER sec 955 of title 28  
the clerk is specifically precluded from  
practicing law the unsigned document of  
the justice is a invalid entry  
see attached  
IN WHICH THE CASE WAS NOT CLOSED PENDING ACTIONS  
OF THE STATE OF VERMONT

3) THE STATE OF VERMONT THROUGH THE POLITICAL  
PARTIES OF THE SHUMLIN, DOUGLAS ADMINISTRATION  
  
IN A FULLY ORCHESTRATED CONSPIRACY WITH THE COUNTIES  
OF RUTLAND COUNTY VT, WASHINGTON COUNTY VERMONT  
Windsor County Vermont, Chittenden County Vermont  
AND THE TOWNS OF PLYMOUTH VERMONT ,KILLINGTON  
  
VERMONT, MIDDLETOWN SPRINGS VERMONT  
FALSIFIED JUDICIAL RECORDS OF COURT ORDERS, *OF COURSES AND APPROPRIATE*  
AND ILLEGALLY SEIZED ROBERT E ZORN CONSTITUTIONAL  
RIGHTS TO DUE PROCESS BY VIOLATING THE PUBLIC RECORDS LAWS  
OF THE STATE OF VERMONT AND F.R.C.T. 44 official record  
AND ARTICLE THREE SECTION TWO RIGHTS OF THE U.S CONSTITUTION  
IN WHICH ILLEGALLY SEIZED EDNA A ZORN ROBERT E ZORNS MOTHER  
  
AND PREMEDITATED AND MURDERED EDNA A ZORN AS A ACCESSORY  
WITHWALTER A ZORN ,AND ARTHUR B ZORN  
PREVIOUSLY THE STATE OF VERMONT AGAINST COURT ORDERS  
FROM THE SECOND CIRCUIT U.S COURT OF APPEALS  
  
HABITUALLY VIOLATED THE ORDERS MANDATED  
TO PROFIT THEIR PRIVATE SECTOR PARTIES  
ACROSS STATE LINES  
in which property was conveyed against the official record  
THE STATE OF VERMONT JUDICIARY FALSELY ARRESTED ROBERT E ZORN  
march 30 2011 after the person OGDEN HERBET G WAS ARRESTED  
AND GROSSLY DEFORMED ROBERT E ZORNS REPUTATION AND  
DESTROYED CONTRCAT RIGHTS IN THE STATE OF VERMONT AND NEW YORK  
  
BY FALSIFYING COURT ORDERS CITING THAT ROBERT E ZORN WAS MENTA

*Page 5*

LLY INCOMPETANT BECAUSE THE RECORDS DIDNT EXSIST THROUGH THE

*(When the Records Exist! and orders*

USE OF STATE PYSCHIATRISTS AND COUNTY OF RUTLAND VT HIRED

PHYSCHIATRIST AFTER THE CERTIFIED COURT ORDERS

WERE PRODUCED TO EACH OFTHE DOCTORS BY ROBERT E ZORN

THE SATTE OF VERMONT FALSELY CONVEYED TITLE TO REAL ESTATE

TO A PERSON RESIDING IN THE STATE OF NEW YORK  
ILLEGALLY

THE VERMONT SUPREME COURT FALSIFIED JUDICIAL RECORDS

AND THE STATE OF VERMONT THROUGH CORRUPT JUDGES

RESIDING IN CASES UNAPPEALLABLE REFUSED TO ALLOW

THE REDRESS OF THE COURT ORDERS UNAPEALABLE AGAINST THE STATE

AND PRIVATE SECTOR PERSONS AND DESTROYED THE RIGHTS

OF THE FIRST AMENDMENT RIGHTS OF ROBERT E ZORN TO FREEDOM

OF S PEECH AND HABITUALLY FALSIFED

WARRANTEE DEEDS AND CONTRACT RIGHTS OF ROBERT E ZORN

OBLIGATED TO SUPPORT UNDER ARTICLE ONE SECT NINE OF THE

U.S.CONSTITUTION, AND UNDER EXPOST FACT RULE VICTIMIZED TO

CRIMINALIZE ROBERT E ZORN

THE STATE OF VERMONT THROUGH THE

USE OF THE JUDICIARY AND PRIVATE SECTOR PERSONS

AND PERSONS

4) WHEN THE STATE OF VERMONT JUSTICE MARY MILES TEACHOUT STATES THAT ROBERT E ZORN IS INCOMPETANT, AFTER THE FACT OF  *falsified official records* THE JUDICIAL RECORDS OF JUDGMENT ORDERS AND APPEAL WERE MADE IN THE LEADING CASE IN WINDSOR COUNTY SUPREIOR

COURT IN WHICH TEACHOUT WAS NAMED AS A DEFENDANT AND

A DEFENDSNT IN THE RELATED CASE ZORN VS S S COTT

SMITH ET AL AND RESIDES IN CASES THAT UNDER THE JURISIDCITON OF STATE LAW

V.R.C.P. 44 PROOF OF OFFICIAL RECORD *FR 0044 Same OS*

STEPHANE RYAN NOR ANY PERSON AFTER THE UNCONTESTED FACT THAT MARY K RYAN UNCONTESTED BY TH E JUDICIAL RECORDS

OF THE STATE OF VERMONT WINDSOR COUNTY COURT PROCEEDINGS AND APPEAL IN THE VERMONT SUPREME COURT AND IN THE REMOVEAL TO U.S DISTRICT WAS THE EXECUTOR OF THOMAS RYANS ESTATE

THE RECORDS OF PUBLIC AND JUDICIAL RECORDS WERE HABITUALLY VIOLATED OF THIS FACT IN WHICH AT NO TIME IN THAT ACTION OF THE COURTS DID THOMAS RYANS ESTATE CHANGE VENUE BY PERMISSION OF THE COURTS IN WHICH MARY MILES TEACHOUT RESIDED AND WAS NAMED AS A DEFE NDANT IN WHICH MARY MILES TEACHOUT FALSIFIED HABITUALLY THE JUDICIAL RECORD

5) SINCE THE CONTRACTS RIGHTS BETWEEN ROBERT E ZORN AND THOMAS RYAN WERE EXCLUSIVE NO ONE ELSE HAD THE CONTRACT RIGHTS TO INTERFER WITH TH EM AND SINCE RYAN DEFAULTED AGAINST THE MONET ARY MONEY OWED MORE THAN THE VALUE OF THE ~~PROPERTY~~ IRREPAIRABLE DAMAGES

6) SINCE THE SAME RULES APPLY UNDER THE COURT LAWS OF THE STATE OF VERMONT THE STATEOF VERMONT RUTLAND COUNTY DISTRICT COURT COULD NEVER OF HELD A COMPETANCY HEARING AFTER KNOWING WHAT THE FACTS OF THE COURT ORDERS AND RELATED CASES OF JUDGMENT ORDERS WERE INW HICH THE ACTIONS OF DIMAURO AND BEARD AND BRIERRE AND THE STATE OF VERMOTNS NEGLECTGENCE OF KNOWING THAT THESE RECORDS ARE ACTUAL AND FSACTUAL CONVICTS DIMAURO AND THE ET AL PERSONS AND OGDEN OF PERJURIYING THEMSELFS IN THEIR OFFICIAL CAPACITYS PROFESSIONAL MISCONDUCT CRIMINAL MISCONDUCT IN WHICH THESE PEOPLE HAVE TO GO TO JAIL IMMEDIATELY LIFE IMPRISONMENT.

7) SINCE THE TOWN CLERK S OF THE TOWNS PERJURED ( THE TOWNS NAM ED IN tHEir OFFICIAL CAPACITY CITING THAT sent SENT THE TAX RECORDS TO THE DEPARTMENT OF TAXES, UNDER ARREST FOR WITH HOLDING EVUDENCE DESTRUCTION OF OFFICIAL PROOF OF RECORD

8) when the state of ~~Vermont~~ substitutes partys  
in THE STATE ACTION OF THE WASHINGTON COUNTY SUPERIOR  
COURT, AND THE FEDERAL COURT JUSTICE STATES  
THAT ROBERT E ZORN DOSENT HAVE THE HABEAUS CORPUS  
RIGHTS TO BRING B THESE ACTIONS TO A FEDERAL COURT  
FOR CIVIL RIGHTS VIOLATOINS AS CITED THE FEDERAL COURT  
JUSTICE HAS NO JURISIDCITON OVER THE CASE  
WHEN THE PERSONS HERBET G OGDEN AND THE STATE JUSTICES  
AND ARTHUR B ZORN , WALTER A ZORN WERE ARRESTED  
FOR VIOLATIONS HABITUAL OF COURT ORDERS AND ILLEGALLY  
SEIZING EDNA A ZORN AND KILLING HER  
AND THE ACTIONS OF DEFAULTING IN THE PROCEEDINGS  
IN WASHINGTON COUNTY PROBATE COURT AND APPEAL OCCURRED  
THE SATTE OF VERMONT HAS NO JUDISDICTION OVER THE CASES  
BOLSTERING THESE FACTS NOR THE FEDERAL COURT JUSTICES  
UNDER THE ANTI INJUCNTION ACT TO CITE  
ROEBRT E ZORN UNDER HABEAUS CORPUS RIGHTS HAS NO JURISIDCITION  
OVER REMOVEAL

9) WHEN THE STATE COURT JUSTICE RUTLAND COUNTY DISTRICT COURT  
STATES THAT ROBERT E ZORN COULDNT REPRESENT HIMSELF PRO SE  
FALSIFYING THE JUDICIAL RECORDS OF THE CASE AND THE LEADING  
CASE RULES THE JUSTICE HAD TO REMOVED, AND THE CASE HAS TO BE  
DISMISSED BY PREJUDICE OF THE COURT BOLSTERING THE FACTS /

PS



10) THE STATE OF VERMONT ,WITH THE COUNTY SUPERIOR  
COURTS, CHITTENDEN, WINDSOR WASHINGTON, RUTLAND  
COUNTY COURTS WITH THE JUSTICES TOOR,  
Dimauro Teachout ,~~M~~artin, Crawford, KATZ,~~BELOCH~~  
ZIMMERMAN, FALSIFIED PUBLIC AND JUDICIAL RECORDS;  
COUNTINUALLY WITH THE PRIVATE SECTOR PERSONS  
AND COURT ORDERS, WITH THE MINICIPAL TOWNS  
KILLINGTON VERMONT,PLYMOUTH VERMONT, MIDDLETOWN SPRINGS  
VERMONT, AND WITH THE JUSTICES OF THE PROBATE COURTS  
*(AND United States)*  
KEVIN CANDON, OF RUTLAND COUNTY PROBATE COURT, GEORGE BELCHER  
OF WASHINGTON COUNTY PROBATE COURT JUSTICE  
IN A FULLY ORCHESTRATED CONSPIRACY UNDER 42 U.S.C 1983  
falsifying contract rights of ROBERT E ZORN AND COURT ORDERS  
MANDATED VIOLATION THE ORDERS, AND STATED ROBERT E ZORN

WAS MENTALLY ILL BECAUSE ~~THE~~ COURT ORDERS DIDINT EXSIST  
AFTER ILLEFGALLY SEIZING ROBERT E ZORN ON MARCH 30 2011  
by the defendants of related cases the VERMONT STATE POLICE  
AND ILLEGALLY TAKEN TO VERMONT STATE HOSPITAL  
BY THE RUTLAND COUNTY DISTRICT COURT JUDGE DIMAUROS COURT

ORDER IN WHICH SANDRA<sup>4</sup> BEARD AND STATE PYSCHIATRISTS  
MUNSON, LINDER, DUNCANE, AND THE COUNTY PAID

PYSCHIATRIST CITED ROBERT E ZORN WAS MENTALLY ILL , AND

INCOMPETANT AGAINST THE COURT ORDERS AND PUBLIC RECORDS HABITUAL  
LY OFFENDING ,

UNDE<sup>2</sup> THE SUBSEQUENT REMEDIAL MEASURE

UNDER FEDERAL RULES EVCIDENCE 497 the actions

of Robert E Zorn

OF THE CASE THAT ROBERT E ZORN ISNT MENTALLY ILL

THE RECORDS EXSISTED AND ROBERT E ZORN

VIOLATED

WAS ILLEGALLY SIEZED

IN WHICH THE JUDICIARY ATTEMPTED TO MAKE ROBERT E ZORN

MENATLLY INCOMPETANT TO CHANGE AND ( TITLE TO

*Convey*

*Property*

THAT ROBETR E ZORN OWNS AND TO COVER UP THE MESS

CREATED IN WHICH THE CANT GET OUT OF !

WHEREBY THE ACTIONS AGAISNT THESE PERSONS

ARE UNCONTESTED THAT THE JUDICIARY OF THE UNITED STSATES  
STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT  
DID DESTROY THE RIGHTS OF THE FIRST AMENDMENT RIGHTS TO RE  
DRESS THE ISSUES AND COURT ORDERS IN WHICH UNDER  
THE ANTI INJUCTION ACT ROBERT E ZORN HAS  
EVERY RIGHT UNDER HABEAUS CORPUS RIGHTS TO REMOVE  
THE CASES, IN WHICH ARE FEDERAL STATE LAW RIGHTS  
IN WHICH THE FDERAL GOVERNMENT COULDNT VIOLATE

STATE LAW OF HABEAUS CORPUS RIGHTS AS ROBERT E ZORN

HAVING THE COURT ORDERS AGAINST THE STATE AND FEDERAL

GOVERNMENT ATTACHED WHEN THE STATE OF VERMONT

DEFIED THE ORDERS BY MAKING NEW CLAIMS AND CONVEYANCES

CAUSING IRREPAIRABLE HARM TO ROBERT E ZORN

HABITUALLY OFFENDING THE JUDICIAL RECORDS  
PUBLIC RECORDS AND ATTEMPTING TO KILL ROBERT E ZORN

- 11) PURSUANT OF THE RELATED CASSE ZORN ROBERT E ZORN, VS THE ESTATE OF THOMAS RYAN MARY K RYAN AND JAMES D BROWN IN WHICH MARY MILES TEACHOUT RESIDED THE OFFICIAL RECORD UNCONTESTED UN APPEALLABLE IS THAT MARY K RYAN WAS THE EXECUTOR OF THE ESTATE OF THOMAS RYAN  
LOOK AT THE BREIF OF THE APPELLANT ROBERT E ZORN IN THE VERMONT SUPREME COURT

OFFICIAL RECORDS IN THE ARCHIVES OF THE STATE OF VERMONT

*(But yet change Title*

- 12) SINCE THE ACTIONS CRIMINALLY BY MARY MILES TEACHOUT AND THE TOWNS OF KILLINGTON VERMONT AND PLYMOUTH VERMONT FALSIFY THE JUDICIAL RECORDS OF THE ESATAE OF THOMAS RYAN AND UNCONTETSTED AS A FACT THE DEFAULT OF JAMES D BROWN BEING SERVED IN NEWELL CON. WHERE THE TAX RECORDS OF THE STATE OF VERMONT PROEPRTY TAXES WERE SENT TO BROWN THE ATTORNEYS LORENTZ LORENTZ AND HARNETT FALSIFIED THE OFFICIAL TAX RECORDS AS WELL THE COURT mary miles tteachout continually

- 13) since Robert E Zorn foreclosed on the propertys of JAMES D BROWN IN PLYMOUTH AND KILLINGTON VERMONT AND THE TAX RECORDS WERE WITHH HELD BY THE TOWN CLERKS

AND IN WHICH ROBERT E ZORN DID PAY THE FIRST HALF OF JAMESD BROWNSS FORECLOSED PROPERTY TAXES TO THE TOWN OF KILLINGTON THE ACTION IS GRAND LARCENY

- 14) SINCE MARY K RYAN DID ALLOW ROBERT E ZORN THE CONVEYANCE OF THE MONETARY RELIEF AS ATTACHED FOR THE LOTS ON THE RYAN PROEPRTY ROBERT E ZORN UNDER V.R.C.P. 66 is the receiver in which the action under this rule cant be dismissed

- 15) since the state of vermont department of taxes acknowledges THE FRAUD OF THE TOWN OF MIDDLETOWN SPRINGS CLERK CASTLE THE ACTIONS CANT BE DISMISSED WITHOUT HOLDING THE STATE LIABLE UNDER THE PUBLIC RECORDS BILL

*an Federal Action Violation*

- 16) SINCE THE CASES ARE ALL RELATED THE STATE A DEFENDANT CONTINUALLY FALSIFYING THESE PUBLIC AND OFFICIAL RECORD

- 17) BY THE ACTIONS OF THE FEDERAL COURT JUSTICE REISS TO CLOSE THE CASE REMOVEALS THEB JUDGE ACTED AGANUIST THE JUDICIAL RECORDS THAT THE STATE OF VERMONT IS A PARTY AND THE JUSTICES AND ET AL DEFENDNATS DESTROYING THE RECORDS OF PUBLIC AND JUDICIAL RECORDS HAVING NO AUTHORITY UNDER THE ANTI INJUCTION ACT TO CLOSE THE CASE UNDER FEDERAL JURISIDCITION

*P11*

15) BY VIRTUE OF THE UNCONTESTED FACT THAT

WILLIAM SORRELL JUST FOUND CACELLLA WASTE GUILTY OF BREACHING THEIR CIVIL CONTRACT WITH THE PEOPLE OF THE STATE OF VERMONT THE CIVIL CONTRACT COURT ORDER OF ROBERT E ZORN VS THE STATE OF VERMONT RUTLAND COUNTYSUPERIOR COURT

M PATRICIA ZIMMERMAN, THE RUTLAND COUNTY SHERIFFS DEPARTMENT THROUGH THE ACTIONS OF THE STATE VIOLATING THE CIVIL CONTRACT OF THE COURT ORDER MANDATED FROM THE U.S COURT OF APPEALS 2nd circuit barring by res judicata collateral ESTOPEL THE STATE OF VERMONT AND THE RLATED CASE PERSONS AND PARTYD THE SATTE OF VERMONT THROUGH THE SHUMLIN, DOUGLAS ADMINISTRAT ION ARE HABITUALL OFFENDERS OF THE COURT ORDER CRIMINALLY IN CO NTEMPT OF MAKIONG NEW FALSE CLAIMS ALL UNDER HABEAUS CORPUS RIGHTS OF ROBERT E ZORN TO PROSECUTE CRIMINALLY AND FOR RELIEF OF THE DEMANDS MADE BY HIM IN THE CASES IN WHICH THEIR IS NO REPSONSE BY THESE PERSONS OR PARTIES DEFAULTING IN THE A CTIONS AND PROCEEDINGS SINCE THE NEWLY ACQUIRED ACTIONS OF THE TOWN OF MIDDLETOWN SPRINGS THROUGH THE TOWN CLERK WITH HELD FEDERAL AND STATE TAX RECORDS SEE ATTACHED

AND THE ~~TOWN~~ CLERK LAURIE CASTLE PERJURED (TOWN OF MIDDLETOWN HERSELF IN HER OCCIAL CAPACITY ( SPRINGS VERMONT BY CITING SHE SENT THE TAX REECORDS IN BEFRORE august 9 2011 the actions of falsificsation of public records has taken place in which these documents are original copies

16) since the town of middletown springs VERMONT IS STILL WITH HOLDING THE PRDERETYYY TRANSFERS TAX RECORDS OF THE FORECLOSURE OF THE GRAYSON ESTATE IN WHICH THE PUBLIC RECORDS OF THE OFFICIAL RECORDS OFGRAYSONS ESATYE

ESTATE FALSIFYING THE OFFICIAL RECORDS OF THE JUDGMENT ORDERS AGAINST HEFFEERMEHL MOLLO AND GRAYSON ARE OFFICIAL RECORDS AND THE ACTIONS OF THE STATE OF VERMONT TO STATE ROBERT E ZORN IS INCOMPETANT BECAUSE THESE RECORDS DONT EXSIST AUTOMATICALLY DISMISSES THE ACTIONS OF THE PROCEEDINGS IN THE RUTLAND COUNTY DISTRICT COURT DOCKET CASE 448 3 -11 RDCV STATE OF VERMONT VS ROBERT E ZORN AND IN THE RUTLAND COUNTY SUPERIOR COURT DOCKET CASE STEPHANE RYAN ET AL VS ROBERT ZORN, AND THE DOCKET CASE WALTER A ZORN VS E Robert Zorn BEACUSE IN ALL THESE CASES THE OFFICIALS RECORDS UNDER THE FALSE CLAIMS ACT FEDERAL LAW INSTATE CRIMINAL LAW

BECAUSE THE RECEIVER THE STATE OF VERMONT UNDR V.R.C.P 66 at no time re argued the cases or appeals or the defendnats cou nter defendnats in which their is no reargument against the judicial records thsat IN THE CASE AND APPEAL WALTER A ZORN AND A RTHUR B ZORN WITH HERBET G OGDEN DID WILLFULLY AND CRIMINAL ILLEGALLY SEIZE EDNA A ZORN AND DID KILL EDNA A ZORN BY LIFTING LIFE SUPPORT FOOM HER AND DESPOSING OF THE CORSE WITH CONENT OF HER ADAVNCE DIRECTIVE NOTARIZED IN A FULLY ORCHESTRATED CONSPIRACY WITH THE PRIVATE SECTOR PARTIES AND STATE JUSTICES AMD ATRTORNEYS

25

20) BACK GROUND STATE MENT OF RELEVANT FACTS FOR CAUSE OF ACTION

THE CASE IN THE STATE OF NEW YORK UNITED STATES  
DISTRICT COURT  
IS CAUSED BY DIVERESITY RULE OF FALSE CLAIMS

AGAINST THE DEFENDANTS CRIMINALLY UNDER THE FALSE CLAIMS ACT

DEFAMATION AND SLANDER LIBEL  
IN WHICH THE RUTLAND HERALD NEWSPAPER FALSIFIED THE ACTIONS  
ACROSS STATE LINES TO NEW YORK AND THE ILLEGAL SEIZURES OF

PRØPERTY CONVEYED BY THE STATE OF VERMONT TO

AFTER THE PERESONS NAMED AS DEFENDANTS FALSIFIED EVERY JUDI

CIAL COURT ORDER JUDGMENT, AND COURT ORDERS MANDATED

AGAINST THE STATE OF VERMONT IN WHICH THE STATE OF VERMONT

THROUGH THE POLITEICAL PARTY OF GOVERNMENT ACTED IN A FULLY ORC

HESTRATED CONSPIRACY AGAINST THE DECLARATORY DECREES

OF THE JUDGMENTS MANDATED INCLUDING TH JUSDTICES

OF TH STATE OF VERMONT VERMONT SUPREME COURT AND THE UNITED

STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

( BY MAKING FALSE CLAIMS AGAINST THE JUDGMENT ORDERS)  
AND THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT JUS

tices named with the clerks of the courts

AND THE PRIVATE SECTOR PERSONS AND COMPANIES AND ATTORNEYS

ILLEGALLY SEIZING ROBERT E ZORN AND EDNA A ZORN

IN WHICH THE STATE OF VERMONT AS A ACESSORY VIOLATED AND

NEVER CONSENTING OR GIVEN UP THE HABEAUS

CORPUS RIGHTS BY WAVING THE RIGHTS

OF DIVERSITY RULE OF TRIALS BY JURY AS A RIGHT

VIOLATED AT AL:L TIMES BY THE JUDICIARY OF THE SATTE OF VERMON

VERMONT IN WHICH THE FEDERAL COURT JUSTICES UNDER THE ANTI INJUN

CTION ACT ARE NAMED AS INDIVIDUALS IN THE STATE OPF VERMONT

IN CRIMINAL HABITUAL DUPLICITY OF VIOLATIONS OF COURT

ORDERS UNAPPEALLAABLE AFTER THE APPEAL WERE FINALIZED

IN THE UNUITED STATES COURT OF APPEALS IN WHICH THEY FILED

NO TIMELY RE ARGUMENT

VIOLATED BY THE TOWNS A S CITED IN VERMONT AND THE OUT

OF STATE PERSONS

pursuant of the criminal silent record

OF CHRISTINA REISS ACTIONS OF FAILING TO DISCLOSE THAT ROBERT  
BY THE NEWLY ATTACHED RECORD

E ZORN NEVER WAIVED HIS RIGHTS TO APPEAL OF THE DECESSIONS  
OR THE USE OF THE U.S DISTRICT COURT VT TO PROSECUTE THESE  
PERSON IN WHICH THE ORDER DEFIES THESE RIGHTS, AND  
OF THE STATE OF VERMONT AS BEING A PARTY IN THE ACTIONS  
OF USING THE JUDICIALSRY FOR RACKETEERING PURPOSES  
TO ILLEGALLY SEIZE THE PROEPRTY OF ROBERT E ZORN, SLAVERY  
AND NEVER WAIVED HIS RIGHTS TO CONVEY TITLE TO REAL ESTATE  
THESE RIGHTS OF CIVIL RIGHTS HAVE BEEN DESTROYED  
BY THE ATTACHED ORDER  
THE CLAIM OF DISMISSAL BY REISS IN THE U.S DISTRICT COURT VT  
IS A FALSE CLAIM IN STRRICT VIOLATION  
OF HABEAYS CORPUS RIGHTS PLACING ROBERT E ZORN IN DOUBLE JEOP.  
OF THE ACTIONS IS UNDER THE ANTI INJUNCTION ACT  
OF THE STATE OF VT ,HAVING NO JURISIDCITON TO DO SO  
OF STATE LAW VIOLATIONS OF THE FIRST AMENDMENT RIGHT TO REDR

ESS AND HAVE PUBLIC ACESS TO THE USE OF THE COURTS  
SEE HUMINSKI VS ZIMMERMAN ET AL ATTACHED

PURSUANT OF THE ACTIONS OF THE ATTORNEY ALLEN  
REPRESENTING ROBERT E ZORN  
KNOWINGLY THAT THE APPEAL WAS MADE AGAINST THE ORDERS  
OF THE STATE OF VERMONT RUTLAND COUNTY DISTRICT COURT  
DOCKET CASE STATE OF VERMONT et al vs  
AND THE BAIL  
ROBERT E ZORN docket case no 448-3 11 rdcr

THE CLAIM OF REISS TO DISMISS AND CLOSE THE CASE BOLSTERS THE  
FACTS THAT THE STATE OF VERMONT AND HER JUSTICES ARE DEFEDANTS  
AS WELL THE ACTIONS OF REISS MAKE HER A DEFENDANTAS WELL  
INCLUDING THE VERMONT SUPREME COURT JUSTICES  
IN WHICH THE SAME ACTIONS OCCURED IN THE PROCEEDINGS  
IN THE STATE OF VERMONT CASES RELATED AND IN THE CASE DOCKET  
448-3 11 RDC R BY THE PUBLIC DEFENDER E ROB SPENSLY CITING  
ROBERT E ZORN DIDNT CONTEST BEING AT THE VERMONT STATE  
HOSPITAL TOTALLY UNTRUE WHEN ROBERT E ZORN NEVER WAIVED HIS  
RIGHTS AS PROSE LITIIGANT THE ACTIONS OF THE JUDICIARY  
ARE A FULLY ORCHESTRATED CONSPIRACY TO ILLEGALLY SEIZE ROBERT E  
ZORNS PROPERTY  
AFTER THE UNCONTETESTED FACT THAT THE STATE OF VERMONT ALLOWED  
THE ILLEGAL SEIZUFRE OF EDNA A ZORN BY THE WASHINGTON COUNTY  
SUPERIOR COURT AND COUNTY ALLOWING THE MURDER  
TO TKAE PLACE OF HER, AND DESPOSING THE BODY BY CREMATYION  
WITH OUT THE CONSENT OF ROBERT E ZORN AND THEN  
ATTEMPTED TO MAKE ROBERT E ZORN INCOMPETANAT  
BY TALING HIM ILLEGALLY TO THE STATE HOSPITAL OF VERMONT  
TO ATTEMPT TO TREAT HIM WITH NARCOTICS TO DESTROY  
HIS MIND AND MEOMORY IN WHICH THE SAME ACTIONS  
TOOK LPLACE TO KILL EDNA A ZORN  
SINCE WHEN ROBERT E ZORN WAS ILLEGALLY SEIZED  
AT THE STATE HOSPITAL TRHE STATE AND PRIVATE SECTOR  
PARTYS AND THE COUNTY OF RUTLAND FILED  
a law suit agsinst Robert Zorn never accepted by robert  
e zorn

P14



2/ JURISDICTION OF THE FEDERAL COURT OF

NEW YORK

RULE NO 17 .1 actions on behalf of incompetant courts  
judiciarys for violations of mandatesd court orders  
section IV.!

THE STATE IS THE PARTY TO WHOM THE SERVICE HAS TO BE SENT

AFTER THE ATTACHED COURT ORDERS BY THE STATE OF VERMONT  
ET AL DEFENDANTS UNDER MANDATORY SENTENCING  
HAVE THE RESPONSIBILITY OF

SAME AS JOINER OF CLAIMS

SAME AS DESIGNATION OF ACTION

DISCOVERY

THE ONLY ACTIONS FOR DISCOVERY IS TO REMOVE THE JUDICIAL  
RECORDS OF THE HABITUAL OFFENDERS VIOLATIONS OF THE COURT ORDERS  
ATTACHED

NOTICE OF JURY TRIAL UNDER DIVERSITY RULE IS DEMANDED BY  
ROBERT E ZORN

AS WELL SETTLEMENTS UNDER WRONG FULL DEATH AS THE STATE  
AND FEDERAL GOVERNMENT ARE PARTIES UNDER DIVERSITY

OFFICIAL RECORDS RULE ~~83~~.1 violations habitually offenders

under default judgment the state of vermont and federal  
GOVT DID DEFAULT IN THE PROCEEDINGS ISSUED  
TO THE STATE OF VERMONT ATTORNEY GENERALS OFFICE  
AND THE UNITED STATES ATTORNEY GENERALS OFFICE OF THE SOLICITOR  
GENERAL

OTHER JURISDICTION FEDERAL INCOME TAX FRAUD IDENTITY THEFT

MISCONDUCT UNDER RULE 83. 5 contempt of court orders  
HABITUALLY

TRANSFER OF OTHER CASES TO ANOTHER DISTRICT  
DUE TO PREJUDICE

AND STATE DUE TO CONTRACT RIGHTS LOST AND ILLEGAL CONVEYANCES  
TO INSTATE OF NEW YORK PERSONS

015

22) STATE VIOLATIONS OF FEDERAL AND STATE LAW

UNCONTETSTED BY THESE PERSONS

A SINCE DIMAURO NEVER RESPONDED TO THESE FACTS THEY ARE UNCONTETSTED

ROBERT E ZORN HAS EVERY RIGHT TO REPRESENT HIMSELF PROSE  
ROBERT E ZORN ISNT A PUBLIC THREAT TO HJIMSELF OR ANY PERSON  
WHEREBY THE FIREARMS ILLEGAL SEIZURES OF THE RIFLES AND SHOT  
GUNS DEMANDS IMMEDIATE POSSESION OF

ROBERT E ZORN SEEKS ~illion dollars in damages to  
against the rutland herald newspaper the doctors  
PSYCHITRISTS WHOM FALSIFIED THE RECORDS  
AS CITED PUNITIVE DAMAGES AND  
INTEREST

O SINCE THE STATE OF VERMONT ALLOWED THE SERVICE TO  
ROBERT E ZORN NOT HIS NAME OF THE COURT ORDERED MANDATE IN  
THE RELATED CASE BROWN ET AL VS ROBERT E ZORN  
AFTER THE CRIMINAL DIVISION OF THE STATE OF  
VERMONT ATTORNEY GENERALS OFFICE REVEIUED  
THE BREIF CITING THE COURT ORDERED MANDATES VALID  
IN WHICH THE SERVICE WAS REFUSED AT THE STATE HOSPITAL BY ROB  
ERT E ZORN " ROBERT E ZORN DEMANDS \$45million dollars inpunit  
ive damages against the law firms of langrock and associates  
the MUNICIPAL UNIFIED COURT OF RUTLAND COUNTY VERMONT  
THE LAW FIRM OF LORENTZ LORENTZ AND HARNETT DEVINE  
THE TOWN OF KILLINGTON VERMONT AND THE  
PERSONS JAMES D BROWN AND THE RYAN PERSON WHOM ISSUED THE C  
COMPLAINT FOR DEFAMATION LIBEL GROSSLY FALSIFYING THE JUDICIAL  
AND PUBLIC RECORDS OF THE ZTATE OF VERMONT IN WHICH  
AT NO TIME WAS ROBERT E ZORN EVER CITED FINES BY THE STATE  
FOR HIS WORK ON THE CONTRACTS OF BROWN AND RYAN  
AND SUBSTITUTION OF ROBERT E ZORN TO THE STATE OF VERMONT ATTOR  
NET GENERAL AGAINST THESE HABITUAL OFFENDERS OF FALSIFYING  
PUBLIC AND JUDIICAL RECORDS UNDER THE FALSE  
CLAIMS ACT , DEMANDING THE FORECLOSURES REVERSING THE ACTIONS OF  
THE SUIT

C SINCE ROBERT E ZORN NEVER ACCEPTED SERVICE OF THE COMPLAINT  
FEDERAL INDENTITY THEHFT OF ROBERT E ZORNS  
FEDERAL INCOME TAX RECORDS BY HERBET G OGDEN AND THE  
PERSONS CITED THE COMPLAINT IS ALSO ISSUED TO THE UNITED STATES  
INTERNAL REVENUE SEWAVICES

O SINCE THE SATTE OF VERMONT ATTORNEY GENERALS OFFICE  
CRIMINAL DIVISION DIDNT DISPUTE THE FRSAUDS OF  
THE STATE AND FEDERAL COURT THE ACTIONS AGAINST THESE  
COURTS IS UNCONTESTED

E UNDER ARTICLE ONE SECTION TEN OF THE U.S CONDTITUTION  
the sate nor federal government has controll over the private se  
ctor contract rights obligated to support  
whereby the attached response to the u.s district court  
is simple that they dont have the jurisidiction to block  
removeal of the case when the state county court  
FALSIFIED INSTATE COURT ORDERS IN DUPLICITY CIVIL HABEAUS COR  
PUS RIGHTS OFROBERT E ZORN



F and all expenses of the injuries of the cruel and insane actions of the vermont state police INFLECTING SERIOUS INJURY TO Robert E Zorn

C ON MARCH 30 2011, seriously injuring him police brutality, as well demanding all court costs and legal expenses and additional claims of libel defamation against each person reversing the claims

# under v.r.c.p 10 c and execution of court order mandates rule 41 c reversing the actions of the STATE OF VERMONT RUTLAND COUNTY DISTRICT COURT, JUDGE THERESA DIMAURO AND THE RUTLAND COUNTY STATE ATTORNEY MARC BRIERRE AND SARAH BEARD AND STATE PSYCHIATRIST DUNCAN MUNSON, PSYCHITRISTS LENDER AND COTTON FALSIFYING JUDICIAL RECORDS AND PUBLIC RECORD IN STRICT VIOLATION DEFANATORY AND DELUSIONAL TO THE FACTS OF THE PAST ACTIONS OF THE CRIMINAL ACTIONS OF HERBET G OGDEN AND THE STATE OF VERMONT RUTLAND COUNTY SUPERIOR COURT AND RELATED COURTS

I WHEREBY ROBERT E ZORN ENTERS THIS NOTICE OF APPEAL ON THIS JUNE appealing all actions OF THE STATE OF VERMONT'S ILLEGAL SEIZURES OF ROBERT E ZORN INCARCERATIONS TO ILLEGALLY SEIZE ROBERT E ZORN, WITNESS TAMPERING AND DEMANDING ALL PROPERTIES ILLEGALLY SEIZED BY THE STATE OF VERMONT, AND THE UNITED STATES DISTRICT COURTS NEWLY ATTACHED ORDER

✓ CITING ROBERT E ZORN MAY NOT BE A DEFENDANT IN THE CASE FALSIFYING THE PUBLIC JUDICIAL RECORDS THAT OF THE BAIL, AND VIOLATIONS OF THE COURT ORDERS OF JUDGE DIMAURO OF THE VERMONT SUPREME COURT ORDER S S COTT SMITH AND THE ORDERS OF MANDATED COURT ORDERS OF THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT HABITUAL OFFENDING THE ORDERS

K WHEREBY ROBERT E ZORN UNDER THE SANCTIONS TO INCLUDE V.R.C.P 82 UNEFFECTED BY THE ORDERS OF THE MALICIOUS COURT THE ORDERS OF THE SAASHINGTON COUNTY PROBATE COURT PROCEEDINGS AND ALL RELATED PROCEEDINGS AGAINST THE COUNTER DEFENDANTS DEFENDANTS ARE VALID

K SINCE MARK BREIERRE <sup>Attorney</sup> ~~STOK~~ AND THE DOCTORS PSYCHITRISTS FALSIFIED THE PHYSICAL BODILY INJURIES LOSS OF HEARING AND TORN SHOULDER ROTOR AND NECK AND KNEE INJURIES CAUSING THE ACTIONS ON MARCH 30 2011 THESE FACTS WERE FALSIFIED BY THE PSYCHITRISTS CAUSING THE ACTIONS TO TAKE PLACE INCLUDING THE UNCONTENDED FACT THAT THE STATE OF VERMONT AND THE JUDICIARY ARE HABITUAL OFFENDERS OF THE RIGHTS OF ROBERT E ZORN TO SEEK TREATMENT UNDER THE DISABILITY RIGHTS ACT VIOLATED BY THE ET AL PARTYS, VERMONT STATE POLICE AIDING AND ATTRIBUTING TO THE PUBLIC THREAT OF THEIR PERSONS AND PARTY MEMBER

P17

23

THE STATE OF VERMONT AND THE UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF VERMONT JUDGE  
DESTROYED THE CONSTITUTIONAL RIGHTS OF HABEAS CORPUS RIGHTS  
OF REMOVING THE THE CASE TO THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT TO REDRESS AND APPEAL THE COURT  
ORDERS OF JUDGE THERESA DIMAURO OF THE RUTLAND COUNTY DISTRICT  
COURT THE STATE COURTOF VERMONT WHEN THE JUSTICES WILL  
FULLY AND AMLICIOUSLY VIOLATED THE COURT ORDERS ATTACHED  
CITING THEY DIDNT EXSIST AFTER BEING SERVED ILLEGALLY SEIZING  
ROBERT E ZORN FORCING ROBERT E ZORN TO HIRE A A TTORNEY  
WHEN THE ATTORNEY AFTER HIRED  
HAD SUPERIOR KNOWLEDGE OF THE COURT ORDERS VIOLATED SEE ATTACHED  
BY THE JUSTICE DIMAURO AND COUNTY OF RUTLAND  
AND HERBET G OGDEN, AND THE STATE ATTORNEY AND THE VERMONT  
SUPREME COURT JUSTICES ET AL INCLUDING WILLIAM SORRELL  
THE STATE OF VERMONT ATTORNEY GENERAL, NEGLECTGENCES  
OF ALLOWING THE ILLEGAL VIOLATIONS OF STATE LAW TO PREVAIL  
IN WHICH THE UNITED STATES SOLICITOR GENERAL  
NEVER CONTESTED BY HIS SERVICES SENT UNDER GOVERNMENT RE  
VEIW THE ACTIONS OF THE UNITED STATES  
TO NOT SUPPORT THE CCOURT ORDERS AND A:LLOW ILLEGAL SEIZURES  
OF ROBERT E ZORN AND HIS PROPERTYS MAKE THE UNITED STATES  
EQUALLY AS GUILTY OF THESE CRIMES  
UNDER DIVERSITY RULE ROBERT E ZORN  
ENTERS THIS COMPLAINT AND SUMMONS  
TO THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW YORK  
IN WHICH THE DEFAMATION BY THE ET AL PERSONS AND STATE

C/10

OF VERMONT AND UNITED STATES

DID VIOLATE ALL CONSTITUTIONAL RIGHTS AS CITED

ACROSS STATE LINES CAUSING IRREPAIRABLE DAMAGES TO ROBERT E ZORN  
BY DEFAMATION AND ALSO CONVEYED REAL ESTATE TO  
JAMES H jr ottaway  
10 watch hill road new paltz n.y 12561

by FALSIFYING THE PUBLIC RECORDS AND JUDICIAL RECORDS  
of the vermont supreme court appeal and windsor county

SUPERIOR COURT CASE ZORN VS RYAN ET AL IN WHICH THE STATE  
VERMONT DEPARTMENT OF TAXES DID CONVEY TITLE TO  
REAL ESTATE BY FALSIFYING THE COURT RECORDS IN WHICH NARY K RYAN  
WAS THE EXECUTOR OF THE ESTATE AND THEN  
TRANSFERRED YEARS LATER TITLE TO  
STEPHEN RYAN ILLEGALLY AFTER HER CONVEYANCES TO ROBERT E ZORN  
AFTER THE PROPERTIES OF THE DEFENDANTS RYAN AND BROWN  
WERE FORECLOSED ON BY ROBERT E ZORN  
IN WHICH THE TOWN CLERKS FAMILY MEMBERS  
ALSO SOLD PROPERTY TO THE SAME PERSON

*Signed Robert E Zorn*

*652 South St*

*Middletown Springs*

*VT 05757*

*August 17<sup>th</sup> 2011*

*August 17<sup>th</sup> 2011*

*Robert E Zorn*

Robert E. Zorn  
652 South St.  
Middletown Springs, VT 05757  
Tel: 802-336-3000

## Other Documents

5:11-mc-00040-cr In Re: Robert E. Zorn **CASE CLOSED on 08/04/2011**  
**CLOSED**

U.S. District Court

District of Vermont

## Notice of Electronic Filing

The following transaction was entered on 8/15/2011 at 1:14 PM EDT and filed on 8/15/2011

**Case Name:** In Re: Robert E. Zorn

**Case Number:** 5:11-mc-00040-cr

**Filer:** Robert E. Zorn

**WARNING: CASE CLOSED on 08/04/2011**

**Document Number:** 8

### Docket Text:

**RESPONSE re: [7] ORDER denying [1] Motion for Leave to file Complaint by Robert E. Zorn. (pjl)**

**5:11-mc-00040-cr Notice has been electronically mailed to:**

**5:11-mc-00040-cr Notice has been delivered by other means to:**

Robert E. Zorn  
652 South Street  
Middletown Springs, VT 05757

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1070689342 [Date=8/15/2011] [FileNumber=555606-0]  
[32de006437406400e35aa1caf01e86152854d6c14cd32e053609265678debb393239  
505e583a50220dc5bf05d1f619192c89d29857f9dd75a98660d71e2e6ffe]]

ROBERT E ZORN  
652 SOUTH STREET  
MIDDLETOWN SPRINGS VT  
05757  
AUGUST 8 2011

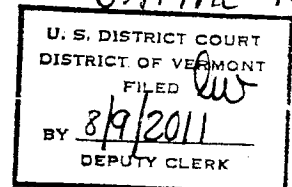
**RECEIVED**  
U.S. DISTRICT COURT

AUG -9 2011

RUTLAND, VT

dear court clerks

- 1) UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT  
P.O.B 607 RUTLAND VT 05702-0607



please find to be filed in THE CASE RE ZORN  
ROBERT E ZORN DOCKET number  
5:11MC 40 cross cases STATE OF VT  
RUTLAND COUNTY DISTRICT COURT  
FOR THE DISTRICT OF VERMONT STATE OF VT vs  
ZORN ROBERT E, docket case no 448 -3 11 RDCR  
CROSS CASE STATE OF VERMONT RUTLAND COUNTY SUPERIOR COURT  
CROSS CASE RYAN ET AL 208 3 11 RDCV  
AND WALTER A ZORN ET AL VS UNKNOWN  
DOCKET CASE NO 21-1 11 rdcv, AND STATE OF VERMONT WASHINGTON COUNTY PROBATE COURT ESTATE OF EDNA A ZORN D.N P067 10 WNE  
state of vermont rutland county superior court

- 2) CLERK rutland county SUPERIOR COURT 88 CENTER STREET  
05701 Rutland vt  
please file 05701  
in the above docket cases

- 3) as well dear clerk STATE OF VT 9 merchants row  
Rutland county DISTRICT COURT RUTLAND VT 05701  
PLEASE FILE IN THE CASE State of Vt vs Robert E Zorn  
the same

RESPONSE TO THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF VERMONT JUDGE REISS ORDER DENYING LEAVE FROM YOUR  
DUTIES FOR FINAL JUDGMENT AND TO PROSECUTE UNDER THE FALSE  
CLAIMS ACT THE PERSONS AND STATE OF VERMONT POLITICAL  
PERSONS

- 4) AND CLERK WASHINGTON COUNTY PROBATE COURT STATE OF VT  
10 ELM STREET MONTPELIER VT 05602  
AND NOTICE OF INTERLOCUTORY APPEAL AFTER THE APPEAL  
WAS BLOCKED IN THE STATE COURT OF VT RUTLAND COUNTY DISTRICT  
COURT

- 5) CLERK  
Internal Revenue services  
p.o.b 9052 ANDOVER MASS 01810 9052

to be filed with ref to 0847123580  
ltr 131c 1

Copy of this cover continued complaint for proven identity the  
theft

Sent to Bill Hyatt

sinned ROBERT E ZORN 652 south street 05757

Case 5:11-mc-00040-cr Document 8 Filed 08/15/11 Page 2 of 42  
PAGE ONE OF CERTIFICATE OF SERVICE

*Original*

UNITED STATES DISTRICT COURT

DOCKET CASE 5:11 MC 40

FOR THE DISTRICT OF VERMONT

cross, STATE OF VERMONT DOCKET CASE  
RUTLAND COUNTY SUPERIOR COURT CASE NO 208 S 11 RDCV  
cross STATE OF VERMONT RUTLAND COUNTY DISTRICT COURT DOCKET CASE  
IN RE TO ROBERT E ZORN No 448-3-111 MC

CROSS RESPONSE TO FILINGS IN VT WASHINGTON COUNTY PROBATE COURT  
response of Robert E Zorn to DOCKET PO67 10 WNE  
ORDER DENYING MOTION FOR LEAVE BY MOTION FOR MISTRIAL

OF THE ORDER DENYING LEAVE DOC NO 5:11 MC 40

DOC 1 OF CHRISTINA REISS CHIEF JUSTICE

BOLSTERING THE FACTS OF THE STATE OF VERMONT VERMONT SUPREME

COURT AND STATE OF VERMONT NAMED AS DEFENDANTS

RELATED CASES FALSIFYING JUDICIAL RECORDS OF  
(ZORN Vs brown et al same as VT SUPREME COURT ET AL JUDGES  
RELATED CASES, AND AFTER THE FACT THAT A APPEAL WAS MADE

TO THE VERMONT SUPREME COURT IN THE ACTION BY

ROBERT E ZORN OF DOCKET CASE 448-3-11 RDCR

STATE OF VERMONT FOR ALL ACTIONS OF THE COURT"

pursuant of the competency hearing the judge  
AND RESPONSE TO NEWLY FORMED FRAUD OF ARTHUR B ZORN  
IN WASHINGTON COUNTY PROBATE COURT VT THE

REASON THAT ROBERT E ZORN WAS ATTEMPTED TO BE MADE INCOMPETANT  
BY THE POLITICAL persons OF THE STATE OF VERMONT  
WAS TO REMOVE THE COURT ORDERED SANCTIONS OF COURT ORDERS MANDA  
TED TO PROFIT THE STATES POLITICAL PRIVATE SECTOR PERSONS  
AND PARTYS IN WHICH THESE ORDERS WERE BOLSTERED AND  
TOTALLY EXTORTED BY THIS RULING ATTACHED

AND PAST COURT ORDERS: MAKING THE ORDER BY REISS, A MISTRIAL"  
WHEREBY ROBERT E ZORN AFTER THE AMENDED ANCILLARY

MOTION TO REMOVE WERE MADE BY ROBERT E ZORN"  
AND IN SUPPORT OF INTERLOCUTORY APPEAL OF THE ORDER"

SINCE THE NEW RULING BOLSTERS THE UNCONTESTED FACT  
THAT THE STATE OF VERMONT HAS BEEN AND STILL IS A DEFENDANT  
IN WHICH THE VERMONT SUPREME COURT AND MARY MILES TEACHOUT  
HAVING SUPERIOR KNOWLEDGE WITH WINDSOR COUNTY SUPERIOR  
COURT AND THE TOWN OF PLYMOUTH, AND RYAN THAT RYAN  
RYAN WAS THE EXECUTOR OF THE ESTATE OF THOMAS RYAN  
JUDICIAL AND PUBLIC RECORDS THE CONVEYANCE TO ANY PERSON  
BY STEPHANE RYAN AUTOMATICALLY PROE BEYOND A DOUBT THAT  
THAT THE JUDICIARY OF THE UNITED STATES DISTRICT COURT  
VERMONT FALSIFIED THE JUDICIAL RECORDS BY THE NEW ORDER  
IN WHICH THE PREVENTION OF HT EMAECHANICS LIENS AGAINST THE  
PROPERTYS OF RYAN AND BROWN WERE PERFECTED, AND THE STATE OF VERM  
ONT VIOLATED THE COURT ORDER MANDATED NOW WITH THE JUYICIARY OF  
UNITED STATES DISTRICT COURT JUSTICE REISS IN WHICH UNDER  
THE ANT INJUNCTION ACT HAS NO JURISDICTON TO ACT TOTALLY  
INCOMPATANT OF THE COURT ORDERED SANCTIONS OF THOSE DECLARATORY  
DECREES IN A FULLY ORCHESTATED CONSPIRACY PROFITTING



CERTIFICATE OF SERVICE  
I ROBERT E ZORN

CERTIFY UNDER THE PENALTY OF PERJURY THAT ON  
AUGUST 8th 2011 ROBERT E ZORN SENT BY PRE PAID FIRST CLASS  
U.S MAIL COPY OF THE PAGE ONE REPOSE TO THE ORDER OF JUSTICE  
REISS PAGE ONE AND RESPONSE TO ARTHUR B ZORN FRAUDULENT  
DEMAND FOR RELEASE OF ROBERT E ZORNS ASSETS FORECLOSED ON  
AND CONEYED BY TITLE TO ROBERT E ZORN BY  
EDNA A ZORN  
AND NOTICE OF INTERLOCUTORY APPEAL  
AND ADDITON ORIGINAL OF SERVICE OF FILINGS AUGUST 4th to the u.s  
district court vt to the litgants as cited below along with  
the certificate of service copy of  
signed ROBERT E ZORN MANDATOR PETITIONOR  
PLAINTIFF COUNTER PLAINTIFF APPELLANT

ON THIS AUGUST 8th 2011

- 1) ARTHUR B ZORN  
37 loomis street montpeier vt 05757
- 2) ATTORNEY GENERAL WILLIAM STATE OF VERMONT DEFENDANTS  
SORRELL FOR HERBERT G UGDEN ET AL CARE OF ATT  
109 STATE ST MONTPELIER VT 05609 GENERAL SORRELL
- 3) town of middletown springs vt  
10 PARK AVE MIDDLETOWN SPRINGS VT 05757
- 4) the Rutland Herald newspaper  
27 WHALES STREET RUTLAND VT 05701
- 5) ATT ALLEN KAMPMAN AND ASSOCIATES  
95 saint paul street Burlington vt  
05401
- 6) TOWN OF PLYMOUTH VERMONT  
CARE OF FRED GLOVER  
68 town office road  
plymouth vt 05056
- 7) LORENTZ LORENTZ AND HARNETT  
26 court street Rutland vt 05701
- 8) united States Att general HOLDER  
CARE OF THE SOLICITOR GENERAL

*Sign* *Robert E Zorn* *August 8-2011*

Robert E. Zorn  
202 South St.  
Middletown Springs, VT 05757  
Tel: 802-454-5228

*Page 20 of 26*  
*Certificate of Service*

1) UNITED STATES DISTRICT COURT

DOCKET CASE 5;11 MC 40

FOR THE DISTRICT OF VERMONT

2) cross, STATE OF VERMONT  
RUTLAND COUNTY SUPERIOR COURT CASE

DOCKET CASE  
NO 208 3 11 RDCV

3) cross STATE OF VERMONT RUTLAND COUNTY DISTRICT COURT DOCKET CASE  
IN RE TO ROBERT E ZORN No 448-3-111 RDCV

4) CROSS RESPONSE TO FILINGS IN VT WASHINGTON COUNTY PROBATE COURT

response of Robert E Zorn to - (DOCKET P067 10 WN 5)  
ORDER DENYING MOTION FOR LEAVE by MOTION FOR MISTRIAL

OF THE ORDER DENYING LEAVE DOC no 5:11 MC 40

DOC 1 OF CHRISTINA REISS CHIEF JUSTICE, *attached*

BOLSTERING THE FACTS OF THE STATE OF VERMONT VERMONT SUPREME

COURT AND STATE OF VERMONT NAMED AS DEFENDANTS, *the Justices*  
*AND*

RELATED CASES FALSIFYING JUDICIAL RECORDS OF *Above cases*  
(ZORN Vs brown et al same as VT SUPREME COURT ET AL JUDGES  
RELATED CASES, AND AFTER THE FACT THAT A APPEAL WAS MADE

TO THE VERMONT SUPREME COURT IN THE ACTION BY

ROBERT E ZORN OF DOCKET CASE 448-3-11 RDCR

STATE OF VERMONT FOR ALL ACTIONS OF THE COURT"

pursuant of the competency hearing the judge *Dimmick*

AND RESPONSE TO NEWLY FORMED FRAUD OF ARTHUR B ZORN

IN WASHINGTON COUNTY PROBATE COURT VT" THE *ONE*

REASON THAT ROBERT E ZORN WAS ATTEMPTED TO BE MADE INCOMPETANT  
BY THE POLITICAL persons OF THE STATE OF VERMONT  
WAS TO REMOVE THE COURT ORDERED SANCTIONS OF COURT ORDERS MANDA  
TED TO PROFIT THE STATES POLITICAL PRIVATE SECTOR PERSONS  
AND PARTYS IN WHICH THESE ORDERS WERE BOLSTERED AND  
TOTALLY EXTORTED BY THIS RULING ATTACHED  
AND PAST COURT ORDERS:.. MAKING THE ORDER BY REISS, A MISTRIAL"  
WHEREBY ROBERT E ZORN AFTER THE AMENDED ANCILLARY

MOTION TO REMOVE WERE MADE BY ROBERT E ZORN"  
AND IN SUPPORT OF INTERLOCUTORY APPEAL OF THE ORDER"

1) SINCE THE NEW RULING BOLSTERS THE UNCONTESTED FACT  
THAT THE STATE OF VERMONT HAS BEEN AND STILL IS A DEFENDANT  
IN WHICH THE VERMONT SUPREME COURT AND MARY MILES TEACHOUT  
HAVING SUPERIOR KNOWLEDGE WITH WINDSOR COUNTY SUPERIOR  
COURT AND THE TOWN OF *Plymouth, And Killington VT, that Mary R.*  
RYAN WAS THE EXECUTOR OF THE ESTATE OF THOMAS RYAN  
JUDICIAL AND PUBLIC RECORDS THE CONVEYANCE TO ANY PERSON  
BY STEPHANE RYAN AUTOMATICALLY PROE BEYOND A DOUBT THAT  
THAT THE JUDICIARY OF THE UNITED STATES DISTRICT COURT  
VERMONT FALSIFIED THE JUDICIAL RECORDS BY THE NEW ORDER  
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PROEPTYS OF RYAN AND BROWN WERE PERFECTED, AND THE STATE OF VERM  
ONT VIOLATED, THE COURT ORDER MANDATED NOW WITH THE JUYICIARY OF  
UNITED STATES DISTRICT COURT JUSTICE REISS IN WHICH UNDER  
THE ANTI INJUCTION ACT HAS NO JURISDICITON TO ACT TOTALLY  
INCOMPATANT OF THE COURT ORDERED SANCTIONS OF THOSE DECLARATORY  
DECREES IN A FULLY ORCHESTARTED CONSPIRACY PROFITTING



UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2011 AUG -4 AM 10:11

CLERK  
BY pih  
DEPUTY CLERK

IN RE: ROBERT ZORN

Case No. 5:11-mc-40

ORDER DENYING MOTION FOR LEAVE  
TO FILE COMPLAINT  
(Doc. 1)

Plaintiff Robert Zorn, representing himself, has submitted a request for leave to file a Complaint.<sup>1</sup> In a prior Order in this case, the court denied, in part, his motion for leave to file, and ordered him to show cause why a potential habeas corpus claim should not be dismissed for lack of state court exhaustion. (Doc. 2.) Mr. Zorn's responses are now before the court. (Docs. 5, 6.)

Mr. Zorn's potential habeas corpus claim pertains to his allegation that he has been involuntarily committed by the state courts. As the court explained in its previous Order, a person who has been involuntarily committed may bring a federal habeas corpus challenge to the fact or duration of that commitment. See *Buthy v. Comm'r of Office of Mental Health of New York State*, 818 F.2d 1046, 1051 (2d Cir. 1987); *Souder v. McGuire*, 516 F.2d 820, 823 (3d Cir. 1975) ("There is no question about the appropriateness of habeas corpus as a method of challenging involuntary commitment to a mental institution."); *Hunter v. Gipson*, 534 F. Supp. 2d 395, 398 (W.D.N.Y. 2008). Before filing a federal habeas corpus petition, however, the petitioner must first exhaust available state court remedies. See 28 U.S.C. § 2254(b)(1)(A).

<sup>1</sup> Because of Mr. Zorn's "proclivity for filing meritless and resource-consuming claims," he has been barred from filing any new actions without receiving leave of the court. See *Zorn v. Brown*, No. 1:05-cv-297, slip op. at 4 (D. Vt. Nov. 30, 2005). The Second Circuit has imposed a similar sanction. See *In re Robert E. Zorn*, No. 09-4273-cv, 09-4278-cv, 09-4281 (consolidated), slip op. at 2 (2d Cir. June 8, 2010) (ordering the Clerk of Court to "refuse to accept for filing any further submissions from Appellant unless he first obtains leave of the Court to file such papers.").

The purpose of exhaustion is to give the state court an opportunity to correct any errors in the state process. See *Coleman v. Thompson*, 501 U.S. 722, 731 (1991). In order to satisfy the exhaustion requirement, a petitioner must have presented his claim to the highest court of the state. See *Fama v. Comm'r of Corr. Servs.*, 235 F.3d 804, 808-09 (2d Cir. 2000) (citing *Picard v. Connor*, 404 U.S. 270, 275 (1971)). While Vermont law provides avenues for direct appeal and collateral review,<sup>2</sup> a petitioner need not exhaust each of these remedies so long as he gives "the state courts one full opportunity to resolve any constitutional issues by invoking one complete round of the State's established appellate review process." *O'Sullivan v. Boerckel*, 526 U.S. 838, 845 (1999).

In this case, Mr. Zorn has not demonstrated exhaustion of the state court process. In his initial filing, he stated that he was challenging his involuntary commitment. (Doc. 1-1 at 5, 11.) After the court issued its show cause Order, Mr. Zorn submitted two additional filings. In the first, he makes several references to a July 12, 2011 competency hearing. (Doc. 5 at ¶¶ 2, 13, 14, 19, 23.) In his more recent filing, Mr. Zorn again refers to the July 12, 2011 hearing, and notes that the state court's ruling is "to be appealed in the [S]tate of [Vermont] [S]upreme [C]ourt." (Doc. 6 at 2.)

Accepting Mr. Zorn's allegations as true, the competency hearing was held just over two weeks ago. While Mr. Zorn clearly plans to appeal the lower court's decision, and may have already done so, there is no suggestion in his filings that his appeal has been considered by the Vermont Supreme Court. Consequently, Mr. Zorn has failed to show cause why his current motion, seeking leave to commence a new action, should not be denied in its entirety for failure to exhaust his state court remedies.

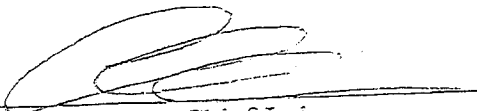
Because Mr. Zorn must demonstrate exhaustion of his state court remedies prior to bringing a federal habeas corpus petition, his motion for leave to file a Complaint (Doc. 1) is DENIED without prejudice, and this case is CLOSED. Should Mr. Zorn exhaust his state court remedies, he may seek leave to re-file his petition in this court.

SO ORDERED.

---

<sup>2</sup> See 12 V.S.A. §§ 2383-86 (direct appeal) and 13 V.S.A. §§ 7131-37 (post-conviction relief).

Dated at Rutland, in the District of Vermont, this 4<sup>th</sup> day of August, 2011.

  
Christina Reiss, Chief Judge  
United States District Court

HAS TAKEN PACE AGAINST ROBERT E ZORNS FOURTH AMENDMENT RIGHTS  
 ROBERT E ZORN AND NO PERSON HAD TO BE PUT IN DOUBLE  
 jeopardy of dimauro or the justices as cited

8) since ARTHUR B ZORN HAS JUST FILED A FALSE CLAIM  
 IN THE STATE OF VERMONT WASHINGTON COUNTY PROBATE COURT

PROCEEDING TO ILLEGALLY SEIZE ROBERT E ZORN PROPERTIES  
 in which robert e zorn never gave any permission to release  
 THE RESPONSE IS MADE CROSS RESPONSE TO THE UNITED STATES  
 INTERNAL REVENUE SERVICES, AND THE STATE OF VERMONT  
 WASHINGTON COUNTY PROBATE COURT TO ENTER FINAL JUDGMENT  
 FOR ALL MONETARY MONIES AND ASSETS EDNA A ZORN HAS  
 AND ALL PROPERTIES ILLEGALLY SEIZED INCLUDING SAFE DEPOSIT  
 PROPERTY CONVEYED TO ROBERT E ZORN BY AMENDED LAST WILL  
 CERTIFIED NOTARIZED BY HARRY HALDT THE THIRD WITNESSED  
 UNCONTESTED IN THE PROBATE COURT PROCEEDINGS  
 IN WHICH THERE IS NO EXECUTOR OF THE ESTATE OF EDNA A ZORN  
 BECAUSE ALL PROPERTIES WERE CONVEYED TO ROBERT E ZORN AS FAR AS  
 MONETARY AND REAL ESTATE COLLATERAL OF EDNA A ZORN  
 AND A MECHANICS LIEN OF HER ASSETS FORECLOSED ON BY ROBERT E ZORN  
 ZORN, IN WHICH THE PERSONS ARTHUR B ZORN AND WALTER A ZORN DEF  
 AULTED IN THE PROCEEDINGS

9) SINCE ARTHUR B ZORN FILED TO THE COURT THE  
 NOTICE TO RELEASE THESE properties  
 THE STATE DOES NOT HAVE JURISDICTION OVER  
 THE CONVEYANCES OF ALL PROPERTIES OF EDNA A ZORN TO ROBERT E ZORN  
 UNCONTESTED BY JUDICIAL RECORD in which Robert E Zorn demands  
 ALL THE PROPERTIES  
 SINCE HERBERT G OGDEN FILED A FRIVOLOUS COMPLAINT  
 ATTEMPTING TO FRAUD ROBERT E ZORN AFTER FILING A FRIVOLOUS COMPL  
 AINT AGAINST ROBERT E ZORN IN WASHINGTON COUNTY SUPERIOR COURT  
 VT AGAINST THE JUDICIAL RECORDS AS CITED PREVIOUSLY  
 HE HAS BEEN UNDER ARREST ALONG WITH THE ATTORNEY GENERAL OF  
 THE STATE OF VERMONT WILLIAM SORRELL  
 IN WHICH THE STATE HAS NO JURISDICTION OVER  
 ANY CASE UNTILL THE DECLARATORY JUDGMENTS OF CONVEYANCES  
 ARE MADE TO ROBERT E ZORN OF THE FORECLOSURES  
 OF THE ET AL PROPERTIES

10) SINCE ARTHUR B ZORN FILED TO ROBERT E ZORN  
 BY UNITED STATES MAIL THE ACTION IT CONVICTS  
 ARTHUR B ZORN OF ACTING UNDER FEDERAL IDENTITY THEFT  
 ALONG WITH HIS PAST ACTIONS OF PRE-MEDITATED MURDER  
 OF EDNA A ZORN WITHIN THE STATE OF VERMONT AS A ACCESSORY

11) IN RESPONSE TO THE COURT STATE OF VERMONT WASHINGTON  
 COUNTY PROBATE COURT AT NO TIME DID ROBERT E ZORN  
 GIVE ANY PERSON PLACE OR THING PERMISSION  
 TO ILLEGALLY SEIZE EDNA A ZORN OR HIS PROPERTIES  
 AND AT NO TIME GIVES CONSENT OR JURISDICTION TO THE COURT  
 OF THE STATE OF VERMONT OR ANY COURT PERMISSION TO  
 ILLEGALLY SEIZE HIS PROPERTIES OR ARTHUR B ZORN  
 OR WALTER A ZORN DEFAULTING IN THE PROCEEDINGS  
 NEVER HAVING ANY JURISDICTION IN WASHINGTON  
 COUNTY TO PROCEED WITH ANY ACTION" OF THE ESTATE OF EDNA A ZORN

(Page) conveyed - to Robert E Zorn  
 uncontested.

12) PURSUANT OF INJUNCTIONS VERMONT RULES AND CIVIL PROCEEDURES RULE 65 (d) FORM AND SCOPE OF RESTRAINING ORDER OR INJUNCTION OF THE PERMANANT IN JUNCTIONS BY RES JUDICATA COLLATERAL ESTOPEL OF THE COURT ORDERED SANCTION OF INJUNCTION<sup>5</sup> AGAINST THE STATE OF VERMONT IN THE CASES, *all related cases* ZORN VS RYAN ET AL, AND ZORN VS THE STATE OF VERMONT ET AL AND THE INJUNCTION ZORN VS PREMIERE HOMES ET AL COURT ORDERS MANDATED BINDING THE PARTIES FROM MAKING NEW CLAIMS AGAINST THE ORIGINAL FACTS OF THE CASES THE SPECIFIC PERFORMANCE UNDER V.R.C.P. 65, 3 THE RELIEF WAS CLEAR AND STILL IS OF THE FORECLOSURES OF ROBERT E ZORN SEE CAMP BELL INNS V BANHOLOZER TURNE AND COMP 1987 148 vt 1, 527 A 2d 1142. in which the false claims of ~~Stephane~~ *Ryan* naming him self of executor of the estate after the court s the VERMONT SUPR<sup>---</sup> COURT AND THE WINDSOR COUNTY SUPERIOR COURT AND THE DEFENDANTS APPELES FAILED TO STATE A CLAIM AGAINST THE PUBLIC RECORD THAT RYAN MARY K RYAN IS THE EXECUTOR OF THOMAS RYANS ESTATE IN WHICH SHE DID CONVEY TITLE TO *(See attached conveyance)* THE MONETARY MONEY OWED OF \$10,000.00 PER LOT IN WHICH THE LOTS WERE UNCONTESTED AS A FACT CLEARED, AND ROBERT E ZORN WAS ENTITLED TO BE PAID FOR THOSE LOTS CLEARED AND ROAD WORK" IN WHICH THE STATE OF VERMONT WAS THEN NAMED AS A DEFENDANT AS WELL THE VERMONT SUPREME COURT ~~JUSTICE~~ *THE NEWLY FORMED ORDER IS A MINISTRIAL BOLSTERING THOSE FACTS* IN WHICH UNDER FEDERAL RULES 50 no fact NO RULING AND UNDER UNDER VERMONT RULES AND CIVIL PROCEEDURES RULE 69 EXECUTION A WRITE OF EXECUTION WASNT NECESSARY BECAUSE THE COURT ORDER MANDATES barred the state of vermont AND PARTIES FROM NEW CLAIMS THE CLAIM BOLSTERED IN THE ATTACHED ORDER BECAUSE OF THE PROCLIVITY OF FILING MERITLESS CLAIMS CONSUMING RESOURCES OF THE JUDICIARY NOT TO ALLOW THE FACTS TO BE ENETERED THE REDRESS OF THE CASES OF THE FIRST AMENDMENT RIGHTS IS HABITUALLY VIOLATED BY THE JUDICIARYS AND THE CHEIF JUSTICE REISS BY HER ORDER ATTACHED SINCE THE PETITIONOR DID PRFESENT THE SANCTIONS OF ARTICLE ONE SECTION TEN CONTRACT RIGHTS TO THE HIGHEST COURT IN THE STATE OF VERMONT, THE VT SUPREME COURT VIOLATED THE COURT ORDERS OF SANCTIONS AS WELL THE JUDGE REISS, AND DIMAURO THROUGH THIS ORD IN WHICH THE ACTIONS OF NOT ALLOWING THE APPEAL OF THE ORDERS OF THE RUTLAND COUNTY DISTRICT COURT CASE DOCKET ~~448-34~~ *448-34* RDCR AFTER VIOLATIONS OF COURT ORDERED MANDATES BY DIMARUO AND THE PRIVATE SECTOR PERSONS UNDER HABEAUS CORPUS RIGHTS ROBERT E ZORN HAD EVERY RIGHT TO REMOVE TO U.S DISTRICT COURT FOR THE DISRICT OF VERMONT THE CASE FOR FINAL JUDGMENT AS WELL THE OTHER CASES RELATED INCLUDING ZORN VS BROWN

13) since the actions now of the attached order HABITUALLY FALSIFY THESE RECORDS AND ORDERS BOLSTERING THE UNCONTESTED FACTS OF THE ACTIONS SENT TO THE COURT AS WELL: OF THE ANCILLARY NOTICE OF REMOVAL IN WHICH WILL BE FILED IN HAND TO THE CLERK AGAIN ON AUGUST 8 2011 with these motions and INTERLOCUTORY APPEAL

*Copy with attached Brief filed 8/20/11*



Exhibit B  
Page 10 of 12

October 31, 2003

Dear Bob,

It is my understanding that Tom approved that you receive \$20,000 for improving the roads to access lots allowed by the town of Plymouth. It is also my understanding that he approved that you should receive \$10,000 per lot at point of sale of each lot for the preparation of same lot as to include removal of brush, trash, wood, and the cutting and removal of any trees that are dead, dangerous and/or obstructing a view.

Sincerely,

  
Mary K. Ryan

Plymouth Town Clerk's Office  
RECEIVED - 10/31/03 at 1:25 PM

P20



is made if the correction isnt made  
BY THE JUSTICE OF THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT COURT OF VERMONT JUSTICE REISS

WHEREBY THE ACTIONS ARE INDENTITY THEFT OF ROBERT E ZORNS  
INCOME TAX RECORDS OF THE UNPAID WORK IN RYANS AND BROWNS

ACTIONS FORECLOSED ON BY JUDICIAL RECORD OF THE MECHANICS  
LIENS UNCONTETSTED SUPRESSED AND BOLSTERED BY THE STATE  
OF VERMONT AND ALL RELATED ACTIONS MISTRIALS  
AGAINST THE ORIGINAL PUBLIC AND JUDICIAL RECORDS  
DEMANDING THE RELIEF AS CITED PREVIOUSLY PUNITIVE  
BUY ROBERT E' ZORN

WHEREBYTHE ACTIONS OF CHEWIF JUSTICE REISS ARE A ~~MISTRIAL~~  
AGAINST THE JUDICAL RECORD  
AND THE PUBLIC RECORDS AS PREVIOUSLY CITED STATUTORY LAW  
VIOLATIONS IN WHICH THE JUSTICE COULD HAVE BEEN MISINFORMED

SINCE THE NEWLY FORMED FRAUD OF THE D STATE OF  
VERMONT DEPARTMENT OEPARTMENT OF TAXESCONVEYANCES  
AS ATTACHED IN THE LAST FILING SENT AUGUST 4 2011  
JUSTICE REISS COULDNT HAVE FORE SEEN THE RECORDS WITH HELD  
BUT MARY MILES TEACHOUT HAS SUPERIOR KNOWLEDGE OF THE ATTACHED  
DOCUMENT CONVEYANCE OF MARY K RYAN AS WELL  
THE STATE OF VERMONT INDITING TEACHOUT WITH  
THE ET AL DEFENDNATSIN THE CASE OF FALSIFYING JUDICIAL RECORDS  
HABITUALLY

life imprisonment'

as a habitual offender

whereby Robert E Zorn on this August 8th 2011  
ENTERS THIS RESPONSE TO THE ORDER ATTACHED OF  
U.S DISTRICT COURT JUSTICE REISS  
EITHER TO CORRECT THE MANIFESTED ERROR OF THE FALSIFYICATION  
OF THESE RECORDS TO PROSECUTE THE STATE OF VERMONT INDIVIDUALS  
UNDER THE FALSE CLAIMS ACT AND IN RESPONSE TO ARTHUR  
B ZORN NEWLY FORMED FRAUD IN WASHINGTON COUNTY PROBATE COURT  
VT AFTER FILING A FALSE COMPLAINT AND COMPLAINT CONTINUALLY  
HABITUALLY AS A OFFENDER OF JUDICAL  
AND PUBLIC RECORDS TO EHTIER CORRECT THE ERRORS OF APPEAL THEM

AS A CONSTITUTIONAL INTERLOCUTORY APPEAL AS A RIGHT  
SINCE THE UNCONTESTED FACT OF THE BOLSTERED FRAUDS CONTINUE  
BY THE JUDICIAL RECORD OF THESE JUSTICES  
IN WHICH THE STATE OF VERMONT NEVER WAS RELEASED AS A PARTY  
UBY ROBERT E ZORN MAKING IOT AN IMPSSIBILTY TO  
HOLD A HEARING OR TRIAL UNTILL THE ORIGINAL  
PROCEEDINGS AND FORECLOSURES UNDER COURT ORDERS  
HAVE BEEN ACTED ON , DEMANDING DISMISSAL  
OFD THE ORDER AND ORDERS AND THE CASE IN THE STATE OF VERMONT  
RUTLAND COUNTY DISTRICT COURT, AND PROCEEDSINGS IN THE STATE  
COURTS AS CITED PAGE ONE OF THE CASES

SIGNED ROBERT E ZORN MANDATOR PETITIONOR  
CROSS

*Robert E Zorn*  
*652 S. St*  
*05757*  
*20 802 2352588*  
*Robert E Zorn*  
*652 S. St*  
*05757*  
*20 802 2352588*

*Original*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT  
ROBERT E ZORN  
CROSS

docket  
CASE NO  
5:11MC 40

THE STATE OF VERMONT  
RUTLAND COUNTY DISTRICT COURT  
THE STATE OF VERMONT

DOCKET CASE NUMBER  
448-3-11 RDCR

POLITICAL PARTYS, HERBET G OGDEN  
ET AL  
VS  
ROBERT E ZORN

NOTICE OF INTERLOCUTORY APPEAL OF THE  
ORDER DENYING MOTION FOR LEAVE TO FILE COMPLAINT  
AND FOR ENFORCEMENT OF CIVIL RIGHTS COURT ORDERS  
SEE ATTACHED ORDER, ,AND CROSS NOTICE OF APPEAL  
OF THE COMPETANCY HEARING JULY 12 2011

and order NOT PUBLISHED BY THE STATE OF VERMONT  
RUTLAND COUNTY DISTRICT COURT JUDGE DIMAURO  
IN WHICH THE ORDERS OF THESE COURT BOLSTERED AND FALSIFIED  
the judicial record and public record of zorn vs brown et al  
THE JUDICIAL RECORDS AND PUBLIC RECORDS OF THE CASE  
AND RELATED CASES, IN VIOLATION OF THE  
CIVIL RIGHTS OF THE 14th AMENDMENT OF ROBERT E ZORNS  
CONSTITUTIONAL RIGHTS AND VIOLATED AETICLE TWO SECTION THREE  
OF THE U.S CONSTITUTIONAL RIGHTS OF ROBERT E ZORN  
AND VIOLATED THE FIFTH AMENDMENT RIGHT , 1st and fourth and  
all rights cited

WHEREBY ON THIS AUGUST 8th 2011 ROBERT E ZORN ENTERS

; this notice of appeal  
of the ATTACHED ORDER, AND THE UNPUBLISHED ORDER  
OF JUDGE DIMAURO AND ALL ORDERS OF JUDGE  
DIMAURO IN THE STATE OF VERMONT RUTLAND COUNTY  
DISTRICT COURT ABOVE DOCKETED CASE, AND ALL ORDERS  
OF JUDGE REISS OF THE UNITED STATES DISTRICT COURT  
IN WHICH HER RULINGS FALSIFY THE ACTUAL FACTS  
AND JUDICIAL RECORDS OF RELATED CASE ZORN VS BROWN ET AL  
AND THE UNCONTESTED FACT THAT THE STATE OF VERMONT IS  
A DEFENDANT IN THE CASE ACTIONS FALSIFIED BY THE ORDER ATT  
ATTACHED IN WHICH THE JURISIDICITON AFTER

THE ~~Persons~~ AND JUDICIARIES VIOLATED COURT ORDERS  
OF CIRCUIT COURT ORDERS IN CONCERT WITH  
PRIVATE SECTOR PARTIES AND PERSONS, ACTED AGAINST THESE CIVIL  
RIGHTS HABEAUS CORPUS RIGHTS OF ROBERT E ZORN  
IN WHICH ROBERT E ZORN ENTERS THIS NOTICE OF INTERLOCUTORY APPEAL  
TO THE UNITED STATES COURT OF APPEALS TO THE SECOND CIRCUIT  
AND THE COURTS ABOVE CITED AND LITIGANTS"

SIGNED ROBERT E ZORN

*Robert E Zorn* ONE OF ONE WITH ATTACH *SD*  
*0001*

NOTE A TRANSCRIPT WAS ORDERED  
BY ROBERT E ZORN AND PAID FOR TO THE COURT REPORTERS 552 SOUTH ST middle  
OF STATE OF VERMONT RUTLAND COUNTY DISTRICT COURT ST middle  
ORDER JULY 12 2011 hearing competency of docket casetown springs VT 05757

ROBERT E ZORN  
761 802 235-2507



UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2011 AUG -4 AM 10:11

CLERK

BY                       
DEPUTY CLERK

IN RE: ROBERT ZORN

Case No. 5:11-mc-40

ORDER DENYING MOTION FOR LEAVE  
TO FILE COMPLAINT  
(Doc. 1)

Plaintiff Robert Zorn, representing himself, has submitted a request for leave to file a Complaint.<sup>1</sup> In a prior Order in this case, the court denied, in part, his motion for leave to file, and ordered him to show cause why a potential habeas corpus claim should not be dismissed for lack of state court exhaustion. (Doc. 2.) Mr. Zorn's responses are now before the court. (Docs. 5, 6.)

Mr. Zorn's potential habeas corpus claim pertains to his allegation that he has been involuntarily committed by the state courts. As the court explained in its previous Order, a person who has been involuntarily committed may bring a federal habeas corpus challenge to the fact or duration of that commitment. *See Butthy v. Comm'r of Office of Mental Health of New York State*, 818 F.2d 1046, 1051 (2d Cir. 1987); *Souder v. McGuire*, 516 F.2d 820, 823 (3d Cir. 1975) ("There is no question about the appropriateness of habeas corpus as a method of challenging involuntary commitment to a mental institution."); *Hunter v. Gipson*, 534 F. Supp. 2d 395, 398 (W.D.N.Y. 2008). Before filing a federal habeas corpus petition, however, the petitioner must first exhaust available state court remedies. *See* 28 U.S.C. § 2254(b)(1)(A).

<sup>1</sup> Because of Mr. Zorn's "proclivity for filing meritless and resource-consuming claims," he has been barred from filing any new actions without receiving leave of the court. *See Zorn v. Brown*, No. 1:05-cv-297, slip op. at 4 (D. Vt. Nov. 30, 2005). The Second Circuit has imposed a similar sanction. *See In re Robert E. Zorn*, No. 09-4273-cv, 09-4278-cv, 09-4281 (consolidated), slip op. at 2 (2d Cir. June 8, 2010) (ordering the Clerk of Court to "refuse to accept for filing any further submissions from Appellant unless he first obtains leave of the Court to file such papers.").

The purpose of exhaustion is to give the state court an opportunity to correct any errors in the state process. *See Coleman v. Thompson*, 501 U.S. 722, 731 (1991). In order to satisfy the exhaustion requirement, a petitioner must have presented his claim to the highest court of the state. *See Fama v. Comm'r of Corr. Servs.*, 235 F.3d 804, 808-09 (2d Cir. 2000) (citing *Picard v. Connor*, 404 U.S. 270, 275 (1971)). While Vermont law provides avenues for direct appeal and collateral review,<sup>2</sup> a petitioner need not exhaust each of these remedies so long as he gives "the state courts one full opportunity to resolve any constitutional issues by invoking one complete round of the State's established appellate review process." *O'Sullivan v. Boerckel*, 526 U.S. 838, 845 (1999).

In this case, Mr. Zorn has not demonstrated exhaustion of the state court process. In his initial filing, he stated that he was challenging his involuntary commitment. (Doc. 1-1 at 5, 11.) After the court issued its show cause Order, Mr. Zorn submitted two additional filings. In the first, he makes several references to a July 12, 2011 competency hearing. (Doc. 5 at ¶¶ 2, 13, 14, 19, 23.) In his more recent filing, Mr. Zorn again refers to the July 12, 2011 hearing, and notes that the state court's ruling is "to be appealed in the [S]tate of [Vermont] [S]upreme [C]ourt." (Doc. 6 at 2.)

Accepting Mr. Zorn's allegations as true, the competency hearing was held just over two weeks ago. While Mr. Zorn clearly plans to appeal the lower court's decision, and may have already done so, there is no suggestion in his filings that his appeal has been considered by the Vermont Supreme Court. Consequently, Mr. Zorn has failed to show cause why his current motion, seeking leave to commence a new action, should not be denied in its entirety for failure to exhaust his state court remedies.

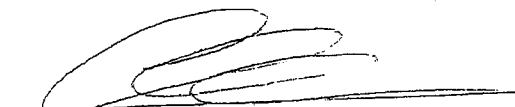
Because Mr. Zorn must demonstrate exhaustion of his state court remedies *prior* to bringing a federal habeas corpus petition, his motion for leave to file a Complaint (Doc. 1) is DENIED without prejudice, and this case is CLOSED. Should Mr. Zorn exhaust his state court remedies, he may seek leave to re-file his petition in this court.

SO ORDERED.

---

<sup>2</sup> See 12 V.S.A. §§ 2383-86 (direct appeal) and 13 V.S.A. §§ 7131-37 (post-conviction relief).

Dated at Rutland, in the District of Vermont, this 4<sup>th</sup> day of August, 2011.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Christina Reiss, Chief Judge  
United States District Court

38) pursuant of the state and county land records of the grand list of the properties in the TOWNS OF PLYMOUTH VERMONT CHAGED IN THE YEAR 2010 SEE ATTACHED THE PERSON OTTWAY BROWN TRANSFERED HIS PROEPRTY TO against the judicial and public records of c ourt orders after ROBERT E ZORN PAID FOR THE TRANFERS IN WHICH THE STATE OF VERMONT CONVEYED TITLE TO THIS PERSON BY THE PAROLE EVIDENCE LEFT OUT BY THE TOWNS OF KILLINGTON PLYMOUTH AND THE SAME CIRCUMSTANCE IN THE TOWN OF MIDDLETOWN SPRINGS ALL VDRMONT TOWNS

39) since teachout filed a injunction after this fact she criminally with the state of VERMONT FALSIFIED PUBLIC RECORDS WITH THE ATTACHED ENTRY OF THE PERSON ATTORNEY SPERRY IN A FULLY ORCHESTRATED CONSPIRACY ACROSS SATTE LINES WITH THE PERSON SEE ATTACHED COPY OF GRAND LIST TRANSFER CONVEYANCE IN WHICH THE STATE OF VERMONT STATED IN THE WEEK OF AUGUST 2nd THAT THE TOWNS NEVER SENT THEM THE TRANSFER NOTICES WHEN IN FACT THE STATE HAS SUPERIOR KNOWLEDGE THAT ROBERT E ZORN AFTER HIS FORECLOSURES AND NOTICES DID FORECLOSE ON THOSE PROEPRTIES UNDER THE SATTUTORY RULES AS APPLIED PURSUANT OF THE INJUCTION BY TEACHOUT IT WAS PRIOR TO THE RESPONSE TIME OIF ANY TO RESPOND TO THE COMPALINT IN WHICH THE ATTACHED COPY OF THE NOTICE OF APPEARANCE OF SPERRY WOOL LANGROCK WAS AFTER THE HEARING IN WHICH NEVER COULD HAVE BEEN HELD UNDER STATUTORY LAW FALSIFYING THE PUBLIC RECORDS OF THE CONVEYANCES IN THE TOWN OF PLYMOUTH VERMONT AND KILLINGTON VERMONT IN WHICH THE ACTIUONS ARE ORGANIZED CRIME A FALSE COMPLAINT NEVR SERVING ROBERT E ZORN UNDER HIS NAME FEDERAL INCOME TAX INDENTITY THSFT RACKETEERING THROUGH THE USE OF THE JUDICIARY BECAUSE ROBERT E ZORN ALREADY FORECLOSED ON THE PROEPRTYS THE STATE OF VERMONT DEFIED THE CIVIL RIGHTS AS CITED OF EQUAL PROTYECTION OF LAWS BOLSTERING THESE FACTS A MISTRIAL BEFORE THE TRIAL IF THE PROPERTY WAS ILLEGALLY SEIZED COULD HAVE TRANSPIRED , BECAUSE THE CONVEYANCES NEVER TOOK PLACE TO ROBERT E ZORN IN WHICH THE FIRM IS LIABLE WITH THE TOWN OF KILLINGTON VERMONT FOR FALSIFICATION OF PUBOLIC AND JUDICIAL RECORDS DEFAMATION LIBEL SLANDER SERIOUSLY INJURYING ROBERT E ZORN THE SAME AS THE ACTIONS A GAINST RUTLAND COUNTY SUPERIOR COURT TO ATTEMPT TO FILE A SUIT AGAINST A UNKNOWN PERSON FALSIFYING ROBERT E ZORNS NAME AFTER THE PUBLIC RECORDS PROVEN AS A FACT FALSIFYED THE FORECLOSURES OF GRAYSONS AND EDNA ZORNS ALLEDGED ESTATE AFTER THE CASE AND APPEAL OF THE WASHINGTON COUNTY PROBATE COURT AND COURTS WERE OVER, ALL FALSE CLAIM UNDER THE FLASE CLAIMS ACT

40) WHEREBY ROBERT E ZORN UNDER HABEAUS CORPUS RIGHTS AS CITED JOINS THESE NEWLY DISCOVERED FRAUDS OF THE STATE AND COURT AND ENTERS THIS ANCILLARY NOTICE OF REMOVEAL TO BE ADDED TO THE CASE REMOVEALS AND DEMANDS JUDGMENT AS CITED AND TO PROCESS THESE CRIMINALS UNDER THE FLASE CLAIMS ACT A PREVIOUSLY CITED CIVIL RIGHTS HABEAUS CORPUS RIGHTS OF ROBERT E ZORN ON THIS AUGUST AUGUST 4 2011 *Rest 2*

Robert E Zorn  
602 South St.  
Middletown Springs, VT 05757  
703-887-1818

STATE OF VERMONT

3431729

SUPERIOR COURT  
Rutland Unit

CIVIL DIVISION  
Docket No. 208-3-11 Rdcv

JAMES D. BROWN, AND STEPHEN RYAN,  
EXECUTOR OF THE ESTATE OF THOMAS RYAN  
Plaintiffs

v.

ROBERT ZORN,  
TOWN OF KILLINGTON, and  
TOWN OF PLYMOUTH  
Defendants

CONFORMED COPY  
VERMONT SUPERIOR COURT  
APR 20 2011  
RUTLAND

PRELIMINARY INJUNCTION

The above-captioned matter came on for hearing regarding Plaintiffs' Motion for Preliminary Injunction at the Vermont Superior Court, Civil Division, on Thursday, April 14, 2011 Honorable Mary Miles Teachout, Vermont Superior Court Judge, presiding. The Plaintiff was represented by his attorney Thaddeus R. Lorentz, Esquire. Defendant Zorn was allowed to listen to the proceeding by telephone. Service was effected upon the Town of Killington with respect to the initial Complaint and the Ex Parte Temporary Restraining Order, however, the Town of Killington did not appear.

After reviewing the pleadings and hearing the representations of Plaintiffs' counsel, the Court makes the following findings:

1. There is evidence that Plaintiff Brown owns property in the Town of Killington since 1966 and acquired two other parcels on or about 1997.
2. There is no evidence that Plaintiff Brown has ever executed a mortgage deed to Defendant Zorn, nor is there evidence that Defendant Zorn perfected a lien through the Mechanic's Lien statutes.
3. Defendant Zorn filed a document in the land records of the Town of Killington entitled "Non-Judicial Foreclosure" on or about June 8, 2010. Said document has no apparent basis in law.

32) DESPITE TH RULINGS THE PERSONS  
 HEFFERMEHL DEFAULTED, MOLO, AND THE SATTE OF VERMONT  
 DEFAULTED IN THE (PROCEEDINGS) AS A CCESSORY TO THE PREMEDITATED  
 MURDER OF EDNA A ZORN ILLEGALLY SEIZING EDNA A ZORN  
 IN AFULLY ORCHESTRATED CONSPIRACY WITH  
 HERBET G OGDEN WALTER A ZORN ARTHUR B ZORN  
 IN WHICH THEY DEFAULTED WITH THE ET AL COUNER DEFENDNATS

BECAUSE THE NEWLY ACQUIRED ATTACHED DOCUMENTS  
 PROVE BEYOND A DOUBT THAT THE RUTLAND COUNTY SUPERIOR  
 COURT IN THE CASES docket 208-3 11 , and  
 CITED PREMEDITATED THE ACTIONMS TO PROFIT THEIR  
 PARTY M, EMEBRS BY FALSIFICATION OF

ROBERT E ZORNS INDENTITY OF MECHANICS LIENS  
 AND PUBLIC RECORDS

IN A FULLY ORCHESTRATED CONSPIRACY WITH THE STATE  
 OF VERMONT AND TOWNS OF MIDDLETOWN SPRINGS VERMONT  
 KILLINGTON VERMONT, PLYMOUTYH VERMONT  
 THESE TOWNS AS MUNICIPALTALITYS ARE JOINED  
 BY TYHESE NEWLY FORMED ACTIONS  
 OF FURTHER FALSIFYING THESE RECORDS WITH HOLDING  
 EVIDENCE IN WHICH PUNITIVE DAMAGES ARE DEMANDED

IN WHICH THE STATE OF VERMONT AND RUTLAND COUNTY HAS A  
 DIRECT CONFLICT OF IONTEREST WITH THE JUDICARYS  
 NAMED DEMANDING ALL COURT COSTS, AND RELIEF AS CITED  
 BY ROBERT E ZORN AND IMMEDIATE DISMISSAL  
 OF THE CLAIMS AGAINST ROBERT E ZORN

E IN ALL CASES AND THE IMMEDIATE DISMISSAL OF THE  
 state claims and retrurn of the bail and proeprties  
 taken in the cases cited page one of this  
 ancillary compalint and injuctive releiff  
 against the VERMONT STATE POLICE AND JUDICIARY  
 OF THE STATE COURTS AND JUSTICES NAMED  
 AND PREVIOUSLY NAMED UNDER MANDATORY SENTENCING

*By Decantary Adjement*

*By Court orders*

*of original cases*

*and Appeal 1*

*Demanding Dismissal of all*

*cases in Rutland County*

*with Prosecution of Page 1*

*Case Docket*



- 26) SINCE THE PERSONS JAMES D BROWN AND JAMES H OTTAWA JR ARE OUT OF STATE PARTIES ILLEGALLY SEIZING ROBERT E ZORNS ~~properties~~ foreclosed on THE ACTIONS ARE UNDER DIVERSITY OF JURISIDCITION IN U.S DISTRICT COURT VERMONT ALL UNDER THE FALSE CLAIMS ACT WHEREBY MARK L SPERRY, STEPHEN RYAN JAMES D BROWN YOU ARE UNDER ARREST AND to the past ARRESTS OF HERBET G OGDEN JOINING AS WELL MARY MILES TEACHOUT, THERESA DIMAURO YOUHAVE THE RIGHT TO REMAIN SILENT EVERY THING YOU STATE WILL BE USED AGAINST YOU IN A COURT OF LAW GOVERN BY THE PEOPLE OF UNITED STATES OF AMERICA, YOU DO HAVE THE RIGHT TO OBTAIN AS MANY ATTORNYRS AS YOU SEE FIT YOU ARE BEING CHARGED WITH CRIMINAL FALSIFICATION OF JUDICIAL RECORDS DEFORMATION, AIDING AND ATRIBUTING THE THE GRAND LARCENY OF HERBET G OGDEN AND THE COUNTER DEFENDANTS OF THE RELATED CAS ES AND CASE AND APPEALS YOU ARE ALSO BEING CHARGED AS HABITUAL OFFENDERS OF ~~FALSIFICATION~~ CATION OF PUBLIC AND JUDICIAL REOCRDS IN A FULLY ORCHESTRATED CONSPIRACY WITH THE NAMED ARTICLE THREE SECTION TWO VIOLATIONS OF CIVIL RIGHTS OF THE UNITED STATES CONSTITUTION , R.I.C.O
- 27) SINCE THE ORDERS OF THE RELEASE RESTRICT THE RIGHTES TO REDRES REDRESS AND RESPOND TO HERBET G OGDENS FALSE CLAIMS THE CLAIMS AGAINST OGDEN ARE RSPONDED TO TO THE ATTORNEY GENERAL OF THE STATE OF VEWRMONT IN WHICH OGDEN VIOPLATED THE RESTRAINING ORDER AGAINST HEFFERMEHLK BEFORE THESE ACTIONS TOOK PLACE
- 28) SINCE THE VIOLATIONS OF CITING ROBERT E ZORN IS INCOMPETANT TO STAND TRIAL ARE AFTER THE TRIALS OF THE ORIGINAL CLAIMS TOOK PLACE THE PERSONS ET AL DEFENDANTS COUNTER DEFENDN TS ARE ALL UNDER ARREST A BEING TOTSLLY INCOMPETANT TO RESIDE AS JUSTICES AND OR ATTORNEYS UNDER MANDATORY SENTENENCING
- 29) SINCE THE PROCESS IN BEHALF OF AND PERSON NOTPARTIES WAS USED UNDER F.R.C.P.71 SAME AS V.R.C.P.71 before the competency hea ring JULY 12 2011 the justice Dimaruo and the sanctions in rutland county district court and superior court in the docketed case state of vt vs zorn 448-3 11 rdcr VTDIST CT, RUTLAND COUNTY: AND ZORN VS E ROBERT ZORN RUTLAND COUNTY SUPERIOR COURT, AND RYAN ETAL VS ROBERT ZORN FALSE CLAIMS BY THE FCATS PREVIOUSLY CITED AND UNDER DECLARATORY DECREES OF THE SATTE LAWS AS CITED PREVIOUSLY AND NEWLY FORMED FACTS AS CITED PUBLIC ANDJUDICIAL RECORDS
- 30) PURSUANT OF THE FACTS THE STATE OF VERMONT WITH THE RUTLAND CO UNTY UNIFORMED MUNICIPAL COURTS BOLATERED THE FACTS WITH THE ET A AL NEWLY ARREESTED PERSONS
- 31) AFTER THE ARRESTS WERE MADE IN THE RELATED CASES FOR FALSIFYING JUDICAL RECORDS THE STATE WAS NAMED PREVIOUSLY AS A COUNTER DEFENDANT IN WHICH THE COURT CASES IN THE STATE OF VERMONT RUTLAN COUNTY UNIFIED COURT THE JUSTICES HAVE NO JURISDICTION OVER AFTER FALSIFYING THE JUDICIAL RECORDS AND BEING NAMED PREVIOUSLY AS DEFENDNATS AND CO AS CORRUPT POLITICAL PERSONS

22) THE PERSONS AND ENTITIES NAMED FALSIFIED THE JUDICIAL

AND PUBLIC RECORDS HABITUALLY OF COURT CASES AND RELATED CASES  
and these records newly found after the fact of transfers

AND COURT ORDERS APPEALED FROM THE UNITED STATES COURT OF

*5th Cir.*

APPEALS FOR THE SECOND CIRCUIT

by the attached order of Teachout

*See ORDER denying Attached Court Lists*  
THE PERSONS AND ENTITIES NAMED AS DEFENDANTS GROSSLY DEFORMED

AND LIBELED ROBERT E ZORN ACROSS STATE LINES DESTROYING

CONTRACT RIGHTS IN THE STATE OF VERMONT AND OTHER

states and the state of

*NEW YORK*

23) THE DEFENDANTS FALSIFIED AND WITH HELD EVIDENCE, AND PERJURED

THEMSELVES HABITUALLY IN COURT ACTIONS IN THE RELATED CASES

AND CASES UNDER FEDERAL JURISDICTION OF THE FALSE CLAIMS ACT

THE DEFENDANTS UNDER 42 U.S 1983 falsified declaratory

decrees of STATE COURT ORDERS, AS INSTATE DEFENDANTS, WHILE

ACTING IN THEIR OFFICIAL CAPACITY AS INSTATE VERMONT JUSTICES

INCLUDING UNITED STATES DISTRICT COURT JUSTICES

WILLIAM SESSIONS THE THIRD, J GARVAN MURTHA, JEROME

NIEDERMIER

*ET AL*

24) THE VERMONT STATE POLICE FALSIFIED POLICE REPORTS, IN A FULLY OR  
CHESTERATED CONSPIRACY WITH THE DEFENDANTS IN PART PRIVATE SECTOR  
PERSONS

25) The firm Langrock and associates falsified the fact that  
the conveyances never took place of the foreclosures  
WITH THE TOWN OF KILLINGTON VERMONT  
AFTER PERJURYING THEMSELVES BY CITING AND AGREEING  
THAT THE FORECLOSURES TOOK PLACE AGAINST THE PUBLIC RECORDS OF  
COURT ORDERS LABELING ROBERT E ZORN  
SERIOUSLY INJURING ROBERT E ZORN WITH THE STATE OF VERMONT  
AFTER TEACHOUT FALSIFIED COURT ORDERS MANDATED  
WITH THE TOWNS LEAVING OUT ROBERT E ZORN'S  
COURT ORDERED SANCTIONS OF THE PREVIOUSLY FILED COURT ORDERS  
IRREPAIRABLE HARM TOTALLY DESTROYING ROBERT E ZORN'S REPUTATION



06/27/2011  
12:22 pmKillington 2011 As Lodged Grand List  
Grand List Report (Detail)  
By Name For All Parcels Main District

Page 68 of

PARCEL INFORMATION	TAXABLE VALUATIONS / EXEMPTIONS / CONTRACTS		
BROOKS JOHN & JEANNE	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
1319 MOORE HOUSE ROAD			
YORKTOWN VA 23690-3617	TOTAL REAL	201,670	201,670
PROP DESC: Condo Unit	SPEC EXEMPTION		0
911 ADDR: 61 ALPINE DRIVE			
PARCEL ID: 10492- SPAN: 588-185-10492			
HOUSESITE: 201,670 ACRES: 0.00 0 NS	GRAND LIST	1,600.00	2,016.70
BROWN CHRISTOPHER	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
323 WHITNEY LN			
DURHAM NC 22713-6644	TOTAL REAL	334,100	334,100
PROP DESC: One Family (< 6 acres)	SPEC EXEMPTION		0
911 ADDR: 19 OVERBROOK DRIVE			
PARCEL ID: 10612- SPAN: 588-185-10612			
HOUSESITE: 334,100 ACRES: 1.02 R1 NS	GRAND LIST	3,139.00	3,341.00
BROWN JAMES D.	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
C/O NANCY BROWN			
29 OXFORD DRIVE			
EAST HARTFORD CT 06118	TOTAL REAL	272,550	272,550
PROP DESC: Vacant Land	SPEC EXEMPTION		0
911 ADDR:			
PARCEL ID: 12759- SPAN: 588-185-12759			
HOUSESITE: 0 ACRES: 118.45 W NS	GRAND LIST	1,168.50	2,725.50
BROWN JEFFREY & KIMBERLY	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
7 CHATHAM WAY			
LYNNFIELD MA 01940	TOTAL REAL	300,470	300,470
PROP DESC: Condo Unit	SPEC EXEMPTION		0
911 ADDR: 120 WEST GLADE AT SUNRISE			
PARCEL ID: 12645- SPAN: 588-185-12645			
HOUSESITE: 300,470 ACRES: 0.00 0 NS	GRAND LIST	3,004.70	3,004.70
BROWN KEVIN F.	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
521 ROLLING HILLS DRIVE			
FAIRFIELD CT 06824	TOTAL REAL	286,200	286,200
PROP DESC: Condo Unit	SPEC EXEMPTION		0
911 ADDR: 145 TIMBERLINE NORTH AT SUNRISE			
PARCEL ID: 12575- SPAN: 588-185-12575			
HOUSESITE: 286,200 ACRES: 0.00 0 NS	GRAND LIST	2,500.00	2,952.00

05/24/2011  
01:28 pmMiddletown Springs Grand List  
Grand List Report (Detail)  
By Name For All Parcels Main DistrictPage 36  
Marilyn I

PARCEL INFORMATION		TAXABLE VALUATIONS / EXEMPTIONS / CONTRACTS			
GRAVES JAMES H	HMSTD FILED	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL	
DOYLE KATHLEEN M	LAND	38,900			
28 SOUTH STREET	BUILDING	139,900			
	TOTAL REAL	178,800	178,800		
MIDDLETOWN SPRINGS VT 05757	SPEC EXEMPTION		0		
TAX MAP:					
PROP DESC: HOUSE AND SHEDS					
911 ADDR: 28 SOUTH STREET					
PARCEL ID: TH02-028-000 SPAN: 393-122-10249					
HOUSESITE: 165,900 ACRES: 7.03 R1 T	GRAND LIST	1,788.00	1,788.00		
GRAYSON NANCY H TRUST		MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL	
STEPHEN CRADDOCK TRUSTEE	LAND	75,100			
1413 PAINE TURNPIKE NORTH	BUILDING	200,100			
	TOTAL REAL	275,200		275,200	
BERLIN VT 05602	SPEC EXEMPTION			0	
TAX MAP:					
PROP DESC: TWO HOUSES, GARAGE AND LAND					
911 ADDR: 668 SOUTH STREET					
PARCEL ID: TH02-668-000 SPAN: 393-122-10161					
HOUSESITE: 161,700 ACRES: 20.02 R2 S	GRAND LIST	2,752.00		2,752.00	
GREEN MOUNTAIN TIMBER FRAMES		MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL	
C/O DANIEL MCKEEN	LAND	21,600			
320 WEST ST	BUILDING	38,700			
	TOTAL REAL	60,300		60,300	
MIDDLETOWN SPRINGS VT 05757-4206	SPEC EXEMPTION			0	
TAX MAP:					
PROP DESC: POTATO BARN & TOWN GARAGE					
911 ADDR: 5 NORTH STREET					
PARCEL ID: TH06-005-000 SPAN: 393-122-10162					
HOUSESITE: 0 ACRES: 0.33 C T	GRAND LIST	603.00		603.00	
GRIMM SARAH H	HMSTD FILED	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL	
SARAH GRIMM TRUST	LAND	295,100			
PO BOX 1066	BUILDING	195,500			
	TOTAL REAL	490,600	490,600		
MIDDLETOWN SPRINGS VT 05757	SPEC EXEMPTION		0		
TAX MAP: P2					
PROP DESC: HOUSE AND BARN, SHEDS 187.20 ACRES					
911 ADDR: 487 SPRUCE KNOB ROAD					
PARCEL ID: TH05-487-000 SPAN: 393-122-10164					
HOUSESITE: 244,500 ACRES: 187.20 R2 T	GRAND LIST	4,906.00	4,906.00		
GRIPPO DAVID		MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL	
GRIPPO KATHRYN	LAND	39,300			
24 WHITEFACE STREET	BUILDING	0			
	TOTAL REAL	39,300		39,300	
5 BURLINGTON VT 05403	SPEC EXEMPTION			0	
TAX MAP: 4					
PROP DESC: 10.28 AC					
911 ADDR: 12 SPRING DRIVE					
PARCEL ID: TH02-000-000 SPAN: 393-122-10041					
HOUSESITE: 1 ACRES: 10.28 M S	GRAND LIST	193.00		193.00	

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Marilyn )

PARCEL INFORMATION		TAXABLE VALUATIONS / EXEMPTIONS / CONTRACTS		
ZACHER MAXIMILIAN & GERTRUDE		MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
	LAND	69,300		
6 LIVINGSTON PLACE	BUILDING	0		
	TOTAL REAL	69,300		69,300
DIX HILLS NY 11746	SPEC EXEMPTION			0
TAX MAP:				
PROP DESC: 20.7 AC				
911 ADDR: 168 SOUTH STREET				
PARCEL ID: TH02-168-L00 SPAN: 393-122-10478				
HOUSESITE: 0 ACRES: 20.70 M NS	GRAND LIST	693.00		693.00
<hr/>				
ZORN EDNA	HMSTD FILED	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
	LAND	35,900		
652 SOUTH ST	BUILDING	119,600		
	TOTAL REAL	155,500	155,500	
MIDDLETOWN SPRINGS VT 05757	SPEC EXEMPTION		0	
TAX MAP:				
PROP DESC: HOUSE & 2.93 ACRES				
911 ADDR: 652 SOUTH STREET				
PARCEL ID: TH02-652-000 SPAN: 393-122-10479				
HOUSESITE: 153,400 ACRES: 2.93 R2 T	GRAND LIST	1,555.00	1,555.00	
<hr/>				
ZORN ROBERT	HMSTD FILED	MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
	LAND	105,700		
652 SOUTH ST	BUILDING	123,800		
	TOTAL REAL	229,500	229,500	
MIDDLETOWN SPRINGS VT 05757	SPEC EXEMPTION		0	
TAX MAP: T / W 8				
PROP DESC: HOUSE & OUTBLOGS. & LAND 56.7				
911 ADDR:				
PARCEL ID: TH02-680-000 SPAN: 393-122-10509				
HOUSESITE: 162,800 ACRES: 56.70 R2 T	GRAND LIST	2,295.00	2,295.00	

06/23/2011

12:05 pm

PLYMOUTH Grand List  
Grand List Report (Detail)  
By Name For All Parcels Main District

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Ca

PARCEL INFORMATION		TAXABLE VALUATIONS / EXEMPTIONS / CONTRACTS			
OTTAWAY JAMES TRUSTEE			MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
10 WATCH HILL ROAD		LAND	42,240		
NEW PALTZ NY 12561		BUILDING	0		
LOCA A: RT 100		TOTAL REAL	42,240		42,240
TAX MAP: 1-5		SPEC EXEMPTION			0
911 ADDR:					
PARCEL ID: 000927. SPAN: 486-153-10105					
HOUSESITE: 42,240 ACRES: 12.20 M S		GRAND LIST	422.40		422.40
OTTAWAY MARK R TRUST			MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
OTTAWAY JAMES H JR TRUST		LAND	10,560		
10 WATCH HILL RD		BUILDING	0		
NEW PALTZ NY 12561		TOTAL REAL	10,560		10,560
LOCA A: LYNDH HILL		SPEC EXEMPTION			0
TAX MAP: 8-189					
911 ADDR:					
PARCEL ID: 001485. SPAN: 486-153-11261					
HOUSESITE: 10,560 ACRES: 5.37 M NS		GRAND LIST	105.60		105.60
OTTAWAY, JAMES W			MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
VELDER, KATRIN A		LAND	250,440		
PAY MY BILLS BOX 14849860		BUILDING	191,200		
SIOUX FALLS SD 57186		TOTAL REAL	451,640		451,640
LOCA A: LYNDH HILL RD, 0864		SPEC EXEMPTION			0
TAX MAP: 8-179 8-180 8-192 8-189					
911 ADDR: 864 LYNDH HILL RD					
PARCEL ID: 000752. SPAN: 486-153-10853					
HOUSESITE: 267,200 ACRES: 135.44 R2 NS		GRAND LIST	4,853.90		4,516.40
PAGONI ROBERT & JANET			MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
27 BARBARA RD		LAND	0		
TOLLAND CT 06084		BUILDING	386,820		
LOCA A: BIRCH LANDING RD (PVT), 0079		TOTAL REAL	386,820		386,820
TAX MAP: 15-54.006		SPEC EXEMPTION			0
911 ADDR: 79 BIRCH LANDING RD (PVT)					
PARCEL ID: 001138. SPAN: 486-153-10855					
HOUSESITE: 386,820 ACRES: 0.00 0 NS		GRAND LIST	3,868.20		3,868.20
PAILLE GORDON W			MUNICIPAL	HOMESTEAD	NON-RESIDENTIAL
PILLE JEAN		LAND	150,500		
113 CHURCH ST		BUILDING	98,920		
SOUTHEASTON MA 02375		TOTAL REAL	259,420		259,420
LOCA A: PAILLE RD 0060		SPEC EXEMPTION			0
TAX MAP: 4-16					
911 ADDR: 60 PAILLE RD					
PARCEL ID: 10045 SPAN: 188-151-10867					
HOUSESITE: 151,120 ACRES: 32.12 01 00		GRAND LIST	2,594.40		2,594.40

LANGROCK SPERRY & WOOL, LLP



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Mark L. Sperry  
PO Box 721, 210 College Street  
Burlington, VT 05402  
(802) 864-0217

545350.1

STATE OF VERMONT

SUPERIOR COURT  
Rutland Unit

CIVIL DIVISION  
Docket No. 208-3-11

JAMES D. BROWN AND STEPHEN  
RYAN, EXECUTOR OF THE ESTATE  
OF THOMAS RYAN,  
Plaintiff,

v.

ROBERT ZORN, TOWN OF  
KILLINGTON AND TOWN OF  
PLYMOUTH,  
Defendant

NOTICE OF APPEARANCE

NOW COMES Mark L. Sperry of the firm Langrock Sperry & Wool, LLP, and hereby  
notices his appearance on behalf of the Defendant, Town of Killington.

DATED at Burlington, Vermont this 21 day of April, 2011.

LANGROCK SPERRY & WOOL, LLP

\_\_\_\_\_  
Mark L. Sperry  
PO Box 721, 210 College Street  
Burlington, VT 05402  
(802) 864-0217  
msperry@langrock.com



STATE OF VERMONT

SUPERIOR COURT  
Rutland Unit

CIVIL DIVISION  
Docket No. 208-3-11

JAMES D. BROWN AND STEPHEN  
RYAN, EXECUTOR OF THE ESTATE  
OF THOMAS RYAN,  
Plaintiff,

v.

ROBERT ZORN, TOWN OF  
KILLINGTON AND TOWN OF  
PLYMOUTH,  
Defendant

ANSWER

NOW COMES Town of Killington ("Town") by its attorneys, Langrock Sperry & Wool, LLP, and hereby answers the Plaintiffs' Complaint as follows:

1. All allegations of the Complaint, except as set forth below, seek relief against Defendant Robert Zorn only, and no answer required by Defendant Town.
2. Notwithstanding the foregoing:
  - a. Town admits to the recording in the Killington Land Records of documents presented to it for recording by Defendant Zorn.
  - b. Defendant Town will follow any order of the Court requested under paragraph 51 of the Complaint respecting how the property in question in the Town of Killington is to be reflected in the Town Grand List.

DATED at Burlington, Vermont this 27 day of April, 2011.

STATE OF VERMONT

SUPERIOR COURT  
Rutland Unit

CIVIL DIVISION  
Docket No. 208-3-11

JAMES D. BROWN AND STEPHEN  
RYAN, EXECUTOR OF THE ESTATE  
OF THOMAS RYAN,  
Plaintiff,

v.

ROBERT ZORN, TOWN OF  
KILLINGTON AND TOWN OF  
PLYMOUTH,  
Defendant

ANSWER

NOW COMES Town of Killington ("Town") by its attorneys, Langrock Sperry & Wool, LLP, and hereby answers the Plaintiffs' Complaint as follows:

1. All allegations of the Complaint, except as set forth below, seek relief against Defendant Robert Zorn only, and no answer required by Defendant Town.
2. Notwithstanding the foregoing:
  - a. Town admits to the recording in the Killington Land Records of documents presented to it for recording by Defendant Zorn.
  - b. Defendant Town will follow any order of the Court requested under paragraph 51 of the Complaint respecting how the property in question in the Town of Killington is to be reflected in the Town Grand List.

DATED at Burlington, Vermont this 27 day of April, 2011.

STATE OF VERMONT

SUPERIOR COURT  
Rutland Unit

CIVIL DIVISION  
Docket No. 208-3-11 Rdcv

JAMES D. BROWN, AND STEPHEN RYAN,  
EXECUTOR OF THE ESTATE OF THOMAS RYAN  
Plaintiffs

v.

ROBERT ZORN,  
TOWN OF KILLINGTON, and  
TOWN OF PLYMOUTH  
Defendants

NOTICE OF HEARING

Upon consideration of Plaintiffs' Motion For Preliminary Injunction, it is hereby ORDERED that the Defendants be and are hereby notified to appear before the Rutland Superior Court, in the City of Rutland, County of Rutland and State of Vermont on the 14<sup>th</sup> day of April, 2011 at 1:00 p.m., then and there to show cause, if any they may have, why Plaintiffs' Motion For Preliminary Injunction should not be granted.

DATED at the City of Rutland, County of Rutland and State of Vermont this 15<sup>th</sup> day of April, 2011.

  
Rutland Superior Court Clerk

914.2356287  
 802 672-3502  
 12 w

Plymouth 2010 Billed Grand List Version 8.6d  
 File Edit Window Help About NEMRC

**Plymouth 2010 Billed Grand List**

**Parcel Maintenance** 000927  
 BROWN JAMES D  
 Total Parcels: 1222 Parcel last updated on: 04/14/2011

Parcel Value/Exempt Misc/Acres Fees/Notes Print/Tax Data Chg Appr Contractors Farm Transfers Homestead Hist. Reappraisal

Parcel #: 000927 Find Real

Owner 1: BROWN JAMES D Find Parcel Status: Active  
 Owner 2: C/O OTTAWAY JAMES H JR TRUSTEE ET AL Find Tax status: T  
 Address 1: 10 WATCH HILL RD  
 Address 2:  
 City/State/Zip: NEW PALTZ NY 12561  
 Location A: RT 100 Find Category: M  
 Location B: Find Owner: S  
 Location C: Find  
 911 Loc: 0 Find Tot. Acres: 12.20  
 Tax Map: 1-5 Find  
 Prop. Desc: VL-12.20 AC Find  
 SPAN: 488-153-10105 Find

Save << Prev Next >> Cancel Close Print Delete

17) IN THE YEAR 2010 ROBERT E ZORN FORECLOSED ON JUDGMENT

ORDERS OF THE STATE OF VERMONT RUTLAND COUNTY COURT  
AND THE UNITED STATES DISTRICT COURT ORDERS FROM THE CIRCUIT  
COURT, AND JOINED THE ACTIONS OF THE CIRCUIT COURT RULING  
OF HUMINSKI VS ZIMMERMAN ET AL SEE ATTACHED ORDER IN WHICH  
THERE IS NO IMMUNITY AS ONCE BELIEVED

18) SINCE THE ACTIONS OF THE TOWN OF MIDDLETOWN SPRINGS FAILURE  
TO FILE TO THE STATE OF VERMONT DEPARTMENT OF TAXES THE FORECLOSURE  
OF THE PROPERTIES OF THE 2.93 acres of land and house conveyed  
TO ROBERT E ZORN IN THE YEAR 1999 they willfully and maliciously  
VIOLATED THE ACTIONS OF ARTICLE FOUR SECTION 4 OF THE PUBLIC RECORDS  
DOCTRINE AND VIOLATED 32 V.S.A. 1671(a)(6)

and violated 32 V.S.A. sec 5201 (c) NOTICE OF NON  
JUDICIAL FORECLOSURE

AND VIOLATED AS WELL VIOLATED RECORDING AND FILING DOCUMENTS

PROPERTY TRANSFER TAX RETURN 32 V.S.A. 9606 (d)

and violated the foreclosure rights under statutory laws  
of the state of vermont 80.1 (1) FORECLOSURE OF JUDGMENT LIENS

as well the town of middletown springs violated the same  
ACTIONS OF JUDGMENT ORDERS AGAINST HEFFERMEHL AND MOLLO  
AND GRAYSON DEFAULTING IN THE U.S DISTRICT COURT PROCEEDINGS  
IN ZORN VS UNITED STATES ET AL AND DEFAULTING  
IN THE JUDGMENT ORDERS AGAINST THESE PERSON IN ZORN VS  
HEFFERMEHL ET AL RUTLAND COUNTY SUPERIOR COURT VY DOCKET NO  
488-8-01 RDCV

19) THE SAME ACTIONS AGAINST THE TOWNS OF PLYMOUTH VERMONT AND THE  
TOWN OF KILLINGTON VERMONT ARE THE SAME VIOLATIONS  
IN THE FORECLOSURES OF THE PROPERTIES OF JAMES D BROWN  
AND THOMAS RYAN IN WHICH THE TOWN CLERKS NEVER SENT THE  
TAX TRANSFERS AND RETURNS TO THE STATE OF VERMONT DEPARTMENT OF  
TAXES, IN WHICH THE TOWN OF KILLINGTON FILED A COMPLAINT  
IN RUTLAND COUNTY SUPERIOR COURT IN WHICH THE COMPLAINT FALSIFIED  
THESE FACTS

20) ORGANIZED CRIME WITH THE COUNTY COURT AND JUDGE TEACHOUT

21) IN WHICH GROSSLY DEFORMED ROBERT E ZORN REPUTATION  
FALSIFIED IN JUDICIAL RECORDS HABITUALLY BY THESE MUNICIPAL  
TOWNS AND COURT IN A FULLY ORCHESTRATED CONSPIRACY SERIOUSLY  
INJURING ROBERT E ZORN AFTER THE DENOVA REVIEW  
WAS UNCONTESTED BY THE STATE OF VERMONT DEPARTMENT OF TAXES,  
AND THEN TO STATE THESE ISSUES AND FACTS DON'T EXIST ROBERT E  
ZORN IS MENTALLY ILL INCOMPETENT THE DAMAGES OF THESE FALSE  
CLAIMS AGAINST EACH TOWN ROBERT E ZORN SEEKS ADDITIONAL TRIPLE DAMAGES  
FOR 135 MILLION DOLLARS. PUNITIVE

*with attached  
copy of 11/2/2011  
and 11/2/2011*

IN WHICH THE STATE OF VERMONT AFTER THE CASES AND JUDGMENT ORDERS  
WERE OBTAINED THROUGH THE CORRUPT CRIMINAL ACTIONS  
OF THERESA DIMAURO AND SARAH BEARD AND BRIERRE  
AND THE MUNICIPAL COURT UNIFIED COURT OF RUTLAND COUNTY  
AND MARY MILES TEACHOUT FALSIFIED THE RUTLAND COUNTY COURT ORDERS  
of the superior court of ROBERT E ZORN VS HEFFERMEHL ET AL  
DSOCKET NO 488-8-01 rdcv and zorn vs s s cott smith  
and ZORN VS THE STATE OF VERMONT RUTLAND COUNTY SUPERIOR COURT  
AND HUMINSKI VS ZIMMERMAN ET AL AND ZORN VS THE STATE OF EDNA  
A ZORN WASHINGTON COUNTY PROBATE COURT DOCKET No P067 10 WNE  
AND THE WASHINGTON COUNTY SUPERIOR COURT JUDGE GEOFFREY  
CRAWFORD WITH THE ET AL COUNTER DEFENDANTS FALSIFIED  
THE JUDICIAL RECORDS AND MANDATED COURT ORDERS PREVIOUSLY  
CITED WITH THE DEPARTMENT OF TAXATIONS OF THE STATE OF VERMONT  
AND THE TOWNS AS CITED AND THEN ATTEMPTED TO MAKE ROBERT E ZORN  
INCOMPETENT IN WHICH DIMAURO DID AFTER BEING TOTALLY INCOMPETENT  
TO RESIDE AS A JUDGE WITH THE ET AL JUSTICES INCLUDING  
J GARVAN MURTHA BY HIS ACTIONS OF FALSIFYING JUDICIAL RECORDS  
BARRING ROBERT E ZORN FROM THE USE OF THE COURT AFTER THE CERTIFIED  
RECORDS OF COURT ORDERS WERE FILED TO HIM HABITUALLY FALSIFYING  
THOSE RECORDS IN WHICH MURTHA HAS NO JURISDICTION TO DO  
IN WHICH THE ACTIONS OF THE NEWLY FORMED FACTS WITH HELD MAKE  
the actions of these court mistrials bolstering and with holding  
these facts of public records in which  
robert e zorn seeks triple damages against under 42 U.S.C. 1983  
against the town of plymouth vermont, middletown springs vermont  
THE STATES OF VERMONT, THE TOWN OF KILLINGTON VERMONT  
THE MUNICIPAL COUNTY OF RUTLAND VERMONT  
THE FIRM LANROCK SPERY AND WOOL THE FIRM  
LORENTZ LORENTZ AND HARNETT PUNITIVE FOR THE AMOUNT AGAINST THESE  
PARTIES OF 135 MILLION DOLLARS PER PARTY

IN ADDITION TO THE RELIEFS OF THE DEMANDS PREVIOUSLY CITED



16) SINCE THE ACTIONS OF THE STATE OF VERMONT DEPARTMENT OF TAXATION WILLFULLY AND MALICIOUSLY FALSIFIED THE JUDICIAL RECORD AND RECORDS OF THE PROPERTY TRANSFERS AND CONVEYANCES WITH THE TOWNS OF MIDDLETOWN SPRINGS VERMONT, KILLINGTON VERMONT AND PLYMOUTH VERMONT ON THE CONVEYANCES OF RYANS AND BROWNS PROPERTYS TRANSFERS AFTER THE FORECLOSURES THE STATE OF VERMONT THROUGH THE SHUMLIN ADMINISTRATION WITH THE PRIVATE SECTOR ATTORNEYS AND THE MUNICIPALITIES FALSIFIED ALL RECORDS OF CERTIFIED COURT ORDERED SANCTIONS MANDATED AGAINST THE STATE OF VERMONT, IN WHICH THE STATE OF VERMONT AND RUTLAND COUNTY superior court with the firm LANGROCK SPERRY AND WOOL AND ASSOCIATES, WITH THE FIRM LORENTZ LORENTZ AND HARNETT AND THE PERSONS JAMES D BROWN AND THE ATTORNEYS FOR

NO DIFFERENT THE TOWN OF MIDDLETOWN SPRINGS COMSPIRED WITH BIRGER HEFFERMEHLS ATTORNEYS AND THE RUTLAND COUNTY SUPERIOR COURT, AND WALTER A ZORN A RTHUR B ZORN ET AL COUNTER DEFENDANTS FALSIFYING THE JUDICIAL RECORDS AND COURT ORDERS MANDATED WITH THE STATE OF VERMONT IN A FULLY ORCHESTRATED CONSPIRACY WITH THE POLITICAL PARTIES OF THE STATE OF VERMONT DEPARTMENT OF TAXES AND JUDGE DIMAURO. THERESA DIMAURO

TO FILE FALSE CLAIMS COMPLAINTS WHEN THE ACTIONS VIOLATED HABITUALLY THE COURT ORDERS PREVIOUSLY CITED OF THE CASES AND THE PUBLIC RECORDS OF ROBERT E ZORN S CONVEYANCES, ALL RECORDED IN THOSE TOWNS BY CERTIFIED COURT ORDERS IN WHICH THE COMPLAINTS FILED IN RUTLAND COUNTY SUPERIOR COURT

IN THE CASES RYAN BROWN town of killington vt et al ARE ALL FALSE CLAIMS AFTER THE CONVEYANCES WERE MADE TO JAMES H OTYTAWAY JR SEE ATTACHED RECORDS AND CONVEYANCES TO RYAN SEE ATTACHED AND THE FALSIFICATION OF THE ACTIONS OF THE JUDICIAL RECORDS AND PUBLIC RECORDS OF WARRANTEE DEEDS AGAINST THE GRAND LISTS OF GRAYSONS ESTATE AND EDNA A ZORNS ESTATE FORECLOSED ON BY ROBERT E ZORN IN WHICH THE CONVEYANCES AFTER ROBERT E ZORN PAID THE FOR THE TRANSFERS AND FEES ET AL NEVER TOOK PLACE

- 11) PURSUANT OF THE PUBLIC RECORDS FILED TO THE STATE OF VERMONT IN THE YEAR 2011 of the foreclosure of the propertys of JAMES D BROWN AND EDNA A ZORN AND THE PROPERTIES OF THOMAS RYAN AND THE PROPERTIES OF THE ESTATE OF NANCY HEVERLEE GRAYSON THE COURT ORDER ATTACHED FALSIFIED THE INDEPTNESS AND THE FORE CLOSURE OF JAMES D BROWNS PROPERTIES IN PLYMOUTH VT AND KILLINGTON VERMONT AFTER THE COURT FALSIFIED THE COURT ORDERED MANDATE OF ZORN VS THE STATE OF VERMONT RUTLAND COUNTY SUPERIOR COURT ET AL THE STATE OF VERMONT WITH THE PRIVATE SECTOR PERSONS BROWN AND RYAN ALLOWED CONVEYANCES
- 12) UNCONTETSTED AS A FACT THE PROPERTY OF JAMES D BROWN FORCLOSED ON AND TRANSFERED LEGALLY TO ROBERT E ZORN, THE STATE of VERMONT DEPARTMENT OF TAXES FALSIED THE JUDICIAL AND PUBLIC RECORDS OF THE TRANFER OF THE PROPERTY IN PLYMOUTH VERMONT OF JAMES D BROWN WHEN IN FACT THE TOWN OF PLYMOUTH VERMONT WILLFULLY AND MALICIOUSLY CONVEYED TITLE TO THE PROPERTY TO JAMES H OTTAWAY JR SEE ATTACHED CONVEAYANCES IN WHICH THE STATE OF VERMONT ILLEGALLY SEIZED ROBERT E ZORN AT THE STATE HOSPITAL IN STRICT VIOLATION OF THE FOURTH AMENDEMNT RIGHTS OF ROBERT E ZORN TO SECURE WITNESS STATEMENTS AGAINST THE ACTIONS IN WHICH THE COURT RUTLAND COUNTY SUPERIOR COURT FALSIFIED THE ACTUAL FACTS OF THE PUBLIC RECORDS BRINGING A FALSE SUIT AGAINST ROBERT E ZORN NEVER BEING SERVED PROEPRLY IN HIS RIHGTFUL NAME IN WHICH THE ATTACHED COURT ORDER INJUNCTION FALSIFIED THE COURT ORDER OF ZORN VS THE STATE OF VERMONT RUTLAND COUNTY SUPERIOR COURT BARRRING NEW CLAIMS BY RES JUDICATA COLLATERAL ESTROPEL  
*See Attached Public Record*
- 13) SINCE THE CONVEYANCES NEVER TOOK PLACE IN THE TOWN OF KILLINGTON (KILLINGTON AND PLYMOUTH VERMONT) THE STATE BROUGHT ABOUT A FALSE SUIT WITH THE PRIVATE SECTOR PERSONS AND ATTORNEYS *AND RUTLAND County* INDUCING SLAVERY AND FURTHER FALSIFYING THE PUBLIC AND JUDICIAL RECORDS AND IDENTITY THEFT OF ROBERT E ZORNS NAME AND HARD EARNEST WORK DONE THROUGH OUT THE YEARS
- 14) SINCE THE JUDGE MURTHA COURT ORDER FALSIFIED THE JUDICIAL ORDERS UNDER COURT ORDERED MANDATES OF THE VERMONT SUPREME COURT AND THE CIRCUIT COURT THE ACTIONS OF MURTHA ARE HABITUALLY ACTED UPON IN A FULLY ORCHESTRATED CONSPIRACY WITH PRIVATE SECTOR POLITICAL PARTY MEMEBRS UNDER R.I.C.O ACROSS SATTE LINES AS INSTATE INDIVIDUALS UNDER THE ANTI INJUNCTIONS ACT OF THE RES JUDICATA COLLATERAL ESTOP el orders of the circuit court stating the dispute against heffermehl was frivilous when the judgment orders he falsified having no jurisidiction over
- 15) THE ACTIONS OF MURTHA BOLSTERED THE FACTS OF THE CASE ZORN VS HEFFERMEHL A MISTRIAL IN WHICH THE UNITED STATES GOVERNMENT VIOLATED THE FIRST AMENDEMNT RIGHGTS OF FREEDOM OF SPEECH AND REDRESS OF ROBERT E ZORN *in mistrial*

9) *contin*

IN WHICH THE CONSTITUTIONAL RIGHTS TO TRIAL BY JURY WERE  
DESTROYED, AFTER THE ACTIONS OF NON COMPLIANCE TO  
DIVERSITY RULE WAS ADMINISTERED BY THE JUDICIARY  
OF THESE COURTS BY THE INDIVIDUALS IN TOTAL DISREGARD FOR  
THE CIVIL RIGHTS OF ROBERT E ZORN'S RIGHTS OF EQUAL  
PROTECTION OF STATE LAWS AND FEDERAL STATE LAWS,  
UNDER THE FALSE CLAIMS ACT

10) SINCE HERBERT G OGDEN WAS ARRESTED IN THE PROCEEDINGS IN WASHINGTON COUNTY SUPERIOR COURT, AND PROBATE COURT VERMONT OF THE CASE ZORN VS ZORN THE ACTIONS AFTER THE SUMMONS AND ARREST OF HERBERT G OGDEN WERE MADE FALSIFIED THE CRIMINAL FALSIFICATION OF THE JUDICIAL COURT ORDERS OF RELATED CASES THROUGH STATE ACTIONS, AS WELL THE ATTORNEY GENERAL WILLIAM SORELL WAS

ARRESTED UNDER COURT ORDER SERVED IN RUTLAND COUNTY VT BY THE STATE OF VERMONT RUTLAND COUNTY SHERIFFS DEPARTMENT I WHICH HERBERT G OGDEN WITH THE STATE OF VERMONT ET AL DEFENDANTS NAMED AS COUNTER DEFENDANTS, BY THE ACTIONS ON MARCH 30TH 2011 OF THE CLERK OF THE RUTLAND COUNTY JUDICIARY TO TELL ROBERT E ZORN TO SERVE HERBERT G OGDEN OGDEN RESISTED

ARREST BY FILING ANOTHER COMPLAINT IN RUTLAND COUNTY VERMONT SUPERIOR COURT IN WHICH THE NAME E ROBERT ZORN WAS USED IN WHICH ROBERT E ZORN NEVER ACCEPTED THE SERVICE IN WHICH THE STATE OF VERMONT RUTLAND COUNTY SHERIFFS DEPARTMENT DEPUTY SKENES FALSIFIED THE COURT ORDERS AGAINST THE RUTLAND COUNTY SHERIFFS DEPARTMENT VT, BARRING NEW CLAIMS IN THE RELATED CASE ROBERT E ZORN VS UNITED STATES

- 3) since THE STATE OF VERMONT STATE ATTORNEY MARC BRIERRE AND THE VERMONT STATE POLICE AND STATE OF VERMONT HAVE A SPECIAL RELATIONSHIP WITH BIRGER HEFFFERMEHL, *et al Counter Defendant* AFTER THE FACT THAT ROBERT E ZORN LOST HIS HEARING PROVEN AS A FACT AT FLETCHER ALLEN MEDICAL CENTER HEARING DOCTORS EXAMINATION BOLSTERED BY THE STATE OF VERMONT JUDICIARY AFTER HEFFFERMEH: KICKED ROBERT E ZORN IN THE HEAD WITH A RESTRAINING ORDER AGAINST HIM AND CONTINUALLY TRESPASSED ON ROBERT E ZORN'S PROPERTY IN WHICH THE STATE POLICE TROOPER PERKINS STATES ISN'T A CRIMINAL ACT, AND AFTER JESSIE MINER WITNESSED THE ATTEMPTIVE ASSAULT ON ROBERT E ZORN UNCONTESTED AS A FACT NOTARIZED BY THE BANKING INSTITUTE CITIZENS BANK
- 4) THE ACTIONS OF SEVERE INJURIES SUSTAINED BY HEFFFERMEHL'S FANTASTIC ACTIONS WITH THE STATE OF VERMONT MAKE THE STATE LIABLE AS WELL
- 5) SINCE THE BOLSTERING OF THE WASHINGTON COUNTY PROBATE COURT RECORDS *Blocked 12/06/10 WML* AND APPEAL BY THERESA DIMAURO AND THE ACTIONS OF SAHRA BEARD TO STATE THAT ROBERT E ZORN THREATENED WILLIAM REID IN WHICH AT NO TIME OCCURRED, BUT DID FILE A COMPLAINT AGAINST WILLIAM REID FOR DISCRIMINATION OF CONTRACT RIGHTS A SPECIAL RELATIONSHIP OF SAHRA BEARD'S ACTIONS OCCURRED
- 6) SINCE ROBERT E ZORN WAS TREATED FOR PHYSICAL INJURIES AT THE STATE HOSPITAL THE STATE OF VERMONT FALSIFIED THE ACTIONS OF THE POLICE REPORT OF THE VERMONT STATE POLICE WITH HOLDING EVIDENCE A MISTRIAL
- 7) SINCE THE JUDICIAL RECORDS WERE BLOCKED HABITUALLY OF THE RELATED CASES THE STATE JUSTICES ARE HABITUALLY OFFENDERS OF FIRST AMENDMENT RIGHTS TO REDRESS
- 8) SINCE THE STATE OF VERMONT PRODUCED AND FORCED A BAIL AND SANCTIONS THAT ROBERT E ZORN COULDN'T GO TO DANBY "ROBERT E ZORN HAS CONTRACTS IN THE TOWN OF DANBY AND DEMANDS THE RIGHTS OF REMOVAL OF ALL SANCTIONS OF THE BAIL AND REVERSAL OF BAIL TO HERBERT G OGDEN
- 9) SINCE THE DEFAMATIONS CREATED BY THE FALSIFYING OF POLICE REPORTS AND JUDICIAL RECORDS NOT ROBERT E ZORN'S ORDERS BUT STATE ORDERS FROM THE VERMONT SUPREME COURT AND U.S.C.A. THE PERSON ROBERT E ZORN HAS LOST JUST ABOUT EVERY CONTRACT IN NEW YORK STATE AND HAS TO TRAVEL YTO GET WORK IN WHICH ROBERT E ZORN IS HOLDING THE ET AL PARTYS LIABLE FOR

THROUGH THE STATE OF VERMONT'S NON COMPLIANCE  
 OF STATE LAWS AND COURT ORDERS FALSIFIED THROUGH THE USE OF  
 THE COUNTY COURTS WINDSOR RUTLAND CHITTENDEN, AND WASHINGTON  
 COUNTIES OF THE STATE OF VERMONT, AND THROUGH THE USE  
 OF THE CIRCUIT COURT, THE UNITED STATES COURT OF APPEALS FOR  
 THE SECOND CIRCUIT, AND THE UNITED STATES DISTRICT COURT  
 UNDER THE ANTI INJUNCTIONS ACT, THE STATE OF VERMONT AND FEDE  
 RAL JUSTICES AS IN STATE PERSON FALSIFIED WILLFULLY AND  
 MALICIOUSLY THE COURT ORDERS, AND SANCTIONS ALLOWING THE ILLEGAL  
 SEIZURES OF PROPERTY SEE ATTACHED ORDERS, *and Public Records*  
 IN WHICH THE STATE OF VERMONT ATTEMPTED TO MAKE  
 ROBERT E ZORN INCOMPETANT, BY FORCING NARCOTIC DRUGS TO  
 DESTROY THE COURT ORDERED SANCTIONS, IN WHICH THE  
 PERSONS WITH THE PRIVATE SECTOR PARTIES GROSSLY DEFORMED  
 TAMPERED WITH A WITNESS AGAINST THEM, ALLOWED  
 EITHER AS A ACCESSORY, OR THE PRINCIPAL THE PRE MEDITATED  
 MURDER OF EDNA A. ZORN AND THE ATTEMPTIVE MURDER OF ROBERT E ZORN  
 IN STRICT VIOLATIONS OF CIVIL RIGHTS, OF THE 14th amendment  
 of the constitutional rights of Robert E Zorn victimizing  
 to criminalize ex post facto rule IN STRICT VIOLATION  
 OF ARTICLE ONE SECTION 4 *of Public Records Act*  
 IN WHICH THE PERSONS FALSIFIED PHYSICAL BODILY INJURIES CAUSE  
 CAUSED BY THE FALSIFICATION AND EXTORTION OF MEDICAL DOCTORS  
 REPORTS, AFTER THE CRIMINAL ACTS TO PLACE  
 SERIOUSLY INJURING ROBERT E ZORN REPUTATION ACROSS  
 STATE LINES CAUSING LOSS OF CONTRACTS, AND THE RIGHTS TO  
 LIFE LIBERTY AND PURSUIT OF HAPPINESS *and Public Records Act*

Robert E Zorn  
 832 South St.  
 Southtown Springs, VT 05747  
 Tel: 802-215-2558



1) *Continued*CRIMINAL VIOLATIONS AND  
CIVIL DISORDERLY CONDUCT  
JUDICIAL MISCONDUCT

UNITED STATES DISTRICT COURT

docket n

FOR THE DISTRICT OF VERMONT

5:11 MC 40

CROSS STATE OF VERMONT RUTLAND COUNTY SUPERIOR COURT  
CASE WALTER A ZORN ET AL VS E ROBERT ZORN

RE: ROBERT E ZORN VS STATE OF VERMONT

HERBET G OGDEN ET AL DEFENDANTS IN THE

CASES AND OR COUNTER DEFENDANTS

CROSS RUTLAND COUNTY SUPERIOR COURT CASE RYAN VS ROBERT ZORN

FROM STATE OF VERMONT RUTLAND COUNTY DISTRICT COURT

docket

STATE OF VERMONT , VS ROBERT E ZORN

num 448-3-11

RDCR

FROM THE STATE OF VERMONT WASHINGTON COUNTY  
PROBATE COURT PROCEEDING AND APPEAL VT SUPREME COURT

THE ESTATE OF EDNA A ZORN

FROM STATE OF VERMONT WASHINGTON COUNTY SUPERIOR COURT  
COURT CASE AND APPEAL EDNA A ZORN ALLEDGED VS ROBERT E ZORN

ANCILLARY COMPLAINT IN RESPONSE TO

THE ORDER OF JUDGE REISS JUNE 20 2011

AND ALLEDGED SIMPLE ASSAULT AND ALLEDGED RESISTING ARREST

FALSE CLAIMS BY RUTLAND COUNTY STATE ATTORNEY BRIERRE

AFTER THE FACT OF THE ARRESTS AGAINST THE COUNTER DEFENDANTS "

HERBET G OGDEN WAS ARRESTED UNDER THE FEDERAL INSATTE

STATUTORY LOCAL LAW OF FALSIFICATION OF

JUDGEMENT ORDERS AND PREMEDITATED MURDER AS A ACCESSORY

AND GRAND LARCENY BY ROBERT E ZORN , SERVED BY THE

WASHINGTON , AND RUTLAND COUNTY SHERIFFS , WITH MARANDA RIGHTS

before the incident on MARCH 30 2011

AND RESPONSE TO THE ATTACHED COURT ORDERS OF TEACHOUT

THE ACTIONS OF HERBET G OGDEN WITH THE STATE OF VERMONT

WALTER A ZORN, ARTHUR B ZORN GEOFFREY CRAWFORD

THE RUTLAND COUNTY SHERIFFS DEPARTMENT, STATE OF VERMONT

WASHINGTON COUNTY JUDICIARY, RUTLAND COUNTY JUDICIARY

TRACEE RUPE OAKMAN, CHAIRTY DOWNS ET AL COUNTER DEFEENDANTS

AND THE VERMONT STATE POLICE DEFENDANTS IN RELATED CASES BEFORE

THE ACTIONS MARCH 30 2011 ARE AND STILL ARE DEFENDANTS ,

TO INCLUDE MARY MILES TEACHOUT, THE RUTLAND AND WASHINGTON

COUNTY JUDICARY OF MUNICIPAL COURTS OFF THE NEWLY FORMED

OBSTRUCTION OF JUSTICE BY FALSIFICATION OF JUDICIAL RECORDS

CONCEALED BY THE JUSTICES OF ORDER FALSIFYING

JUDICIAL RECORDS HABITUALLY *and the state got a FAX from*

UNDER THE LOCAL FEDERAL RULES UNDER THE FALSE CLAIMS A CT,

OF FALSIFYING EDNA A ZORN'S IDENTITY BY ILLEGALLY REMOVING

HER FROM RUTLAND COUNTY VERMONT TO WASHINGTON

COUNTY VERMONT, AND TAKING HER OFF LIFE SUPPORT

PREVIOUSLY ADMINISTERED BY WALTER A ZORN AND ARTHUR

B ZORN BY FORGING A DIRECTIVE CITING EDNA

a zorn didnt want life support

the State of Vermont Herbert G ogden and these parties

DID COMMIT THE CRIME OF PRE MEDITATED MURDER FIRST DEGREE

THE RPINDIPALS AETHUR B ZORN, WALTER A ZORN

AND ACESSORIES THE STATE OF VERMONT HERBET G OGDEN

did falsify every deed and record

in the WASHINGTON COUNTY SUPERIOR COURT AND PROBATE COURT

2) THE ACTIONS OF HERBET G OGDEN FALSIFYING JUDICIAL

Robert E Zorn  
152 South St  
Washington Springs, VT 05757  
Tel: 802-235-2809



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

FROM  
THE STATE OF VERMONT RUTLAND  
COUNTY SUPERIOR COURT  
DOCKET CASE

WALTER A ZORN ET AL  
VS E ROBERT ZORN AND  
( NO SUCH PERSON)

CRIMINAL AND CIVIL  
NOTICE OF REMOVAL OF THE CASE  
AND CASES TO INDITE THE PERSONS  
AND FIRMS AND ~~STATE~~ OF VERMONT  
POLITICAL PARTY OF THE SHUMLIN  
ADMINISTRATION OF THE STATE  
THE STATE OF VERMONT AND STATE  
OF VERMONT FOR DISORDERLY  
CRIMINAL CONTEMPT ANF PROFESS  
IONAL MISCONDUCT docket case

5:11 MC 40

FROM RUTLAND COUNTY SUPERIOR COURT

DOCKET NO 25 1 11 rdcv

from RUTLAND COUNTY SUPERIOR COURT  
STEPHANE RYAN , JAMES D BROWN  
TOWN OP KILLINGTON VT ET AL

VS  
ALLEDGEDLY ROBERT E ZORN ,WITH HOLDING  
COURT ORDERED MANDATES ROBERT E ZORN

DOCKET CASE NO 208-3-11  
RDCV

FROM STATE OF VERMONT RUTLAND COUNTY DISTRICT  
COURT

STATE OF VERMONT VS

DOCKET CASE no 448-3-11  
RDCR

ROBERT E ZORN ALLEDGED DEFENDANT

ANCILLARY NOTICE OF REMOVEAL  
PURSUANT OF NEWLY DISCOVERED FRAUD OF THE STATE OF VERMONT  
IN A FULLYT ORCHESTRATED CONSPIRACY WITH THE POLITICAL  
PRIVATE SECTOR PERSONS,AND LAW FIRMS LORENTZ LORENTZ AND HARNE  
TTT LANGROCK SPERRY AND W OOL ET AL  
AND THE TOWN OF PLYMOUTH VERMONT AND THE TOWN OF MIDDLETOWN  
SPRINGS VERMONT AND THE TOWN OF KILLINGTON VERMONT  
falsifying and with holding public and judicial  
RECORDS ORGANIZED CRIME BOLATERING THE FACTS  
WITH THE FIRMS AS CITED

i )whereby by the criminal violations to be added  
to the

PAGE TWO

state of vermont

ATTORNEY GENERAL

WILLIAM SORRELL 109 state street MONTPELIER VT 05609

for ET AL STATE PARTYS

INCLUDING THE STATE OF VERMONT DEPT OF TAXES

AND HERBET G OGDEN ARRESTED

IN STATE ET AL COUNTER DEFENDANTS *De Conde*

TOWN OF MIDDLETOWN SPRINGS VERMONT

10 PARK AVE MIDDLETOWN SPRINGS VERMONT 05757

united states attorney general

CARE OF THE UNITED STATES SOLICITOR GENERAL

950 PENN AVE N.W WASHINGTON D.C 20530

THE RUTLAND HERALD NEWSPAPER

27 whales street RUTLAND VT 05701

att allen

ALLEN KAMPMAN STETLER

95 SAINT PAUL ST

BURLINGTON vt 05401

ATTORNEY

SPERRY

P.O.B 721 210 college st BURLINGTON VT 05402

for town of killington VT AND HIMSELF AND FIRM

for town of plymouth

VT CARE OF FRED GLOVER

TOWN OF PLYMOUTH VT 68 town office road

plymouth vt

05056

*Coastal Locks 26 Court St Rutland VT  
and Vermont 05701*

signed Robert E Zorn

PLAINTIFF COUNTER PLAINTIFF CROSS

MANDATOR ALLEGED DEFENDANT AUGUST

4 2011



*Note SMC*

*Rutland Regional*

*Med. Center Doanville*

*in Washington Court*

*system out*

*113 Street 15 miles*

CERTIFICATE OF SERVICE PAGE ONE

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

FROM  
THE STATE OF VERMONT RUTLAND  
COUNTY SUPERIOR COURT  
DOCKET CASE

WALTER A ZORN ET AL  
VS F ROBERT ZORN A  
( NO SUCH PERSON)

FROM RUTLAND COUNTY SUPERIOR COURT

from RUTLAND COUNTY SUPERIOR COURT  
STEPHANE RYAN , JAMES D BROWN  
TOWN OF KILLINGTON VT ET AL

VS  
ALLEGEDLY ROBERT E ZORN , WITH HOLDING  
COURT ORDERED MANDATES ROBERT E ZORN

FROM STATE OF VERMONT RUTLAND COUNTY DISTRICT  
COURT

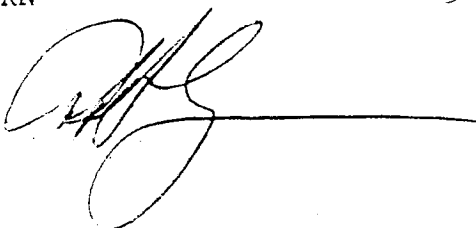
STATE OF VERMONT VS

ROBERT E ZORN ALLEGED DEFENDANT

ANCILLARY NOTICE OF REMOVEAL  
PURSUANT OF NEWLY DISCOVERED FRAUD OF THE STATE OF VERMONT  
IN A FULLY ORCHESTRATED CONSPIRACY WITH THE POLITICAL  
PRIVATE SECTOR PERSONS, AND LAW FIRMS LORENTZ LORENTZ AND HARNE  
TTT LANGROCK SPERRY AND W OOL ET AL  
AND THE TOWN OF PLYMOUTH VERMONT AND THE TOWN OF MIDDLETOWN  
SPRINGS VERMONT AND THE TOWN OF KILLINGTON VERMONT  
falsifying and with holding public and judicial  
RECORDS ORGANIZED CRIME BOLATERING THE FACTS  
WITH THE FIRMS AS CITED

I ROBERT E ZORN PLAINTIFF COUNTER PLAINTIFF CROSS  
ALLEGED DEFENDANT MANDATOR CERTIFY UNDER THE PENALTY OF  
PERJURY SERVED COPY OF THE ABOVE CAPTIONED ANCILLARY NOTICE  
OF REMOVEAL TO THE LITIGANTS PAGE TWO OF THIS SERVICE  
OF CERTIFICATE OF SERVICE, *ON August 4 2011 By Rec Port*

SIGNED ROBERT E ZORN



CRIMINAL AND CIVIL  
NOTICE OF REMOVEAL OF THE CASE  
AND CASES TO INDITE THE PERSONS  
AND FIRMS AND ~~STATE~~ OF VERMONT  
POLITICAL PARTY OF THE SHUMLIN  
ADMINISTRATION OF THE STATE  
THE STATE OF VERMONT AND STATE  
OF VERMONT FOR DISORDERLY  
CRIMINAL CONTEMPT AND PROFFESS  
IONAL MISCONDUCT docket case

5:11 MC 40  
DOCKET NO 25 1 11 RDCV

DOCKET CASE NO 208-3-11  
RDCV

DOCKET CASE no 448-3-11  
RDCR

ROBERT E ZORN  
653 south street  
MIDDLETOWN SPRINGS  
VERMONT 05757  
August 4 2011

1) DEAR COURT CLERK: UNITED STATES DISTRICT COURT  
for the district of vermont  
PLEASE FIND TO BE FILE ANCILLARY NOTICE OF REMOVEAL  
OF THE CASES RUTLAND COUNTY SUPERIOR AND DISTRICT COURTS  
VERMONT docket cases no. 25-1 11 RDCV  
DOCKET CASE N 208 3-11 RDCV --- AND DOCKET CASE  
NO 448 3 11 RDCR

2) DEAR COURT CLERK RUTLAND COUNTY SUPERIOR COURT  
83 center street Rutland vt 05701 please find the same

3) DEAR COURT CLERK STATE OF VERMONT RUTLAND COUNTY DISTRICT COURT  
PLEASE FIND THE SAME FOR REMOVEAL TO U,S DISTRICT COURT  
VT THE DOCKET CASE 448-3 11 RDCR

4) UNITED STATES FEDERAL INTERNAL REVENUE S SERVICES CRIMINAL  
DIVISION ANDOVER MASS 0810 9052 file 0847123580  
THIS IS A COUNTUHD COMPLAINT AGAINST THESE PERSONS AND  
THE STATE OF VERMONT POLITICAL PARTY  
IN WHICH THESE FACTS ARE SOME OF THE WORST FORMS OF INDENTITY  
THEFT THAT CAN TAKE PLACE IN UNITED STATES  
CITING CLAIMS AGAINST ROBERT E ZORN WHEN THEY FALSIFIED THE  
COURT ORDERZ AND JUDGMENTS INM A FULLY ORCHESTRATED CONSPIRACY  
AS CITED AND THEN FILED SUIT AGAINST E ROBERT ZORN  
AND ROBERT ZORN LEAVING OUT COURT ORDERS

PLEASE ALSO FIND CERTIFICATE OF SERVICE

SIGNED ROBERT E ZORN  
AUGUST 4 2011



*Copy  
of Cover  
to All*

Robert E. Zorn  
142 South St.  
Middletown Springs, VT 05757  
Tel: 802-735-7659

**MANDATE**

UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

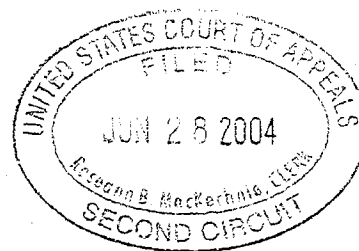
24  
DCVT/BRVT  
02 cv 193  
Niedermeier

**SUMMARY ORDER**

THIS SUMMARY ORDER WILL NOT BE PUBLISHED IN THE FEDERAL REPORTER AND MAY NOT BE CITED AS PRECEDENTIAL AUTHORITY TO THIS OR ANY OTHER COURT, BUT MAY BE CALLED TO THE ATTENTION OF THIS OR ANY OTHER COURT IN A SUBSEQUENT STAGE OF THIS CASE, IN A RELATED CASE, OR IN ANY CASE FOR PURPOSES OF COLLATERAL ESTOPPEL OR RES JUDICATA.

At a stated term of the United States Court of Appeals for the Second Circuit, held at the United States Courthouse, Foley Square, in the City of New York, on the 28<sup>th</sup> day of June Two thousand four.

PRESENT: ROGER J. MINER  
JOSÉ A. CABRANES  
CHESTER J. STRAUB  
*Circuit Judges*



-----x  
ROBERT E. ZORN,

*Plaintiff-Appellant,*

-v.-

No. 03-7027

M. PATRICIA ZIMMERMAN, Superior Court Judge,  
State of Vermont, RUTLAND COUNTY SUPERIOR COURT,

*Defendants-Appellees,*  
-----x

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED  
2007 AUG 16 AM 9 38  
CLERK  
BY *WJB*  
DEPUTY CLERK

APPEARING FOR APPELLANT: Robert E. Zorn, pro se, Middletown Springs, VT

APPEARING FOR APPELLEE: SHANNON A. BERTRAND, Reiber, Kenlan,  
Schwiebert & Facey, P.C., Rutland, VT

Appeal from a judgment of the United States District Court for the District  
of Vermont (Jerome J. Niedermeier, *Magistrate Judge*).

UPON DUE CONSIDERATION, IT IS HEREBY ORDERED, ADJUDGED, AND  
DECREED that the judgment of the District Court is hereby AFFIRMED.

Robert E. Zorn appeals from a judgment of the District Court dismissing his claims  
against Judge Zimmerman and the Rutland County Superior Court. The District Court  
dismissed the claims against Judge Zimmerman based on judicial immunity and the claims  
against the Rutland County Superior Court based on the Eleventh Amendment.

For substantially the reasons stated by Magistrate Judge Niedermeier in his thorough  
opinion, we affirm.

We have considered all of plaintiff's claims on appeal and we hereby AFFIRM the  
judgment of the District Court.

FOR THE COURT,

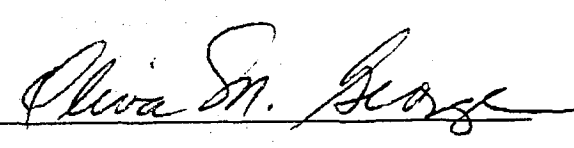
Roseann B. MacKechnie, Clerk of Court

A TRUE COPY  
Roseann B. MacKechnie, CLERK

by

  
DEPUTY CLERK

By

  
Oliva M. George, Deputy Clerk

UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT  
THURGOOD MARSHALL U.S. COURT HOUSE  
40 FOLEY SQUARE  
NEW YORK 10007

DCVT/BRVT  
02 cv 193  
Niedermeier

Roseann B. MacKechnie  
CLERK

Date: 6/28/04  
Docket Number: 03-7027-cv  
Short Title: Zorn v. Zimmerman  
DC Docket Number: 02-cv-193  
DC: DISTRICT OF VERMONT (BURLINGTON)  
DC Judge: Honorable Jerome Niederme  
**ITEMIZED AND VERIFIED BILL OF COSTS**

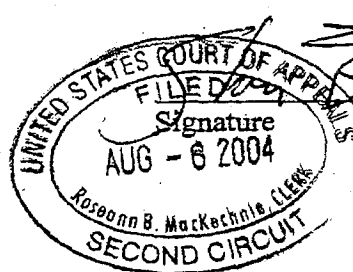
Counsel for Hon. M. Patricia Zimmerman  
respectfully submits, pursuant to Rule 39 (c) of the Federal Rules of Appellate Procedure the within bill of costs and requests the Clerk to prepare and itemized statement of costs taxed against the  
Plaintiff, Robert E. Zorn  
and in favor of Defendant, Hon. M. Patricia Zimmerman  
for insertion in the mandate.

Docketing Action

Costs of printing appendix (necessary copies 12 x 164 pages) 1968 pages @ .10 - \$196.80  
Costs of printing brief (necessary copies 12 x 15 pages) 180 pages @ .10 - 18.00  
Costs of printing reply brief (necessary copies \_\_\_\_\_)

(VERIFICATION HERE)

I, Shannon A. Bertrand, Esq., hereby certify that the above information is accurate, based upon personal knowledge regarding preparation of the referenced documents in the captioned matter.



Shannon A. Bertrand, Esq. TRUE COPY  
Roseann B. MacKechnie, CLERK

STATE OF VERMONT  
COUNTY OF RUTLAND

DEPUTY CLERK

Sworn to and subscribed to this  
8th day of July, 2004.

Before me, Sara R. [Signature]  
Notary Public  
Commission Expires: 02/10/07

STATEMENT OF COSTS  
Taxed in the amount of \$ 214.80 in favor of  
Appellee Hon. M. Patricia Zimmerman  
FOR THE COURT:  
ROSEANN B. MACKECHNIE, Clerk

AUG - 6 2004  
Date

Tracy W. Young, Motions Staff Attorney

CERTIFIED: 8/10/04



VERMONT SUPREME COURT  
FILED IN CLERK'S OFFICE

ENTRY ORDER

FEB 4 2011

2011 VT 10

SUPREME COURT DOCKET NO. 2009-035

NOVEMBER TERM, 2009

Robert E. Zorn

v.

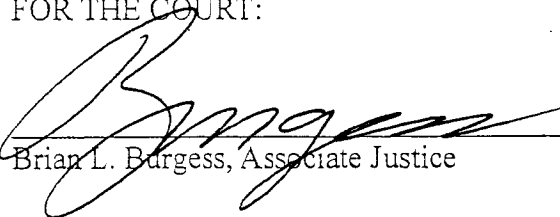
S. Scott Smith

} APPEALED FROM:  
}  
} Rutland Superior Court  
}  
} DOCKET NO. 571-9-00 Rdcv

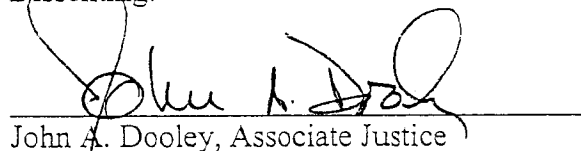
In the above-entitled cause, the Clerk will enter:

The trial court's decision is affirmed, as modified to explicitly limit its application to this case and to allow plaintiff the opportunity to move for reconsideration due to inability to afford counsel.

FOR THE COURT:

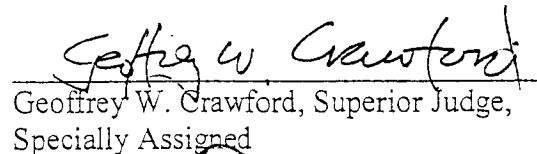
  
Brian L. Burgess, Associate Justice

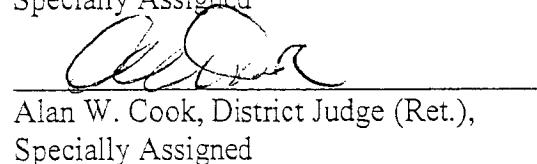
Dissenting:

  
John A. Dooley, Associate Justice

  
Denise R. Johnson, Associate Justice

Concurring:

  
Geoffrey W. Crawford, Superior Judge,  
Specially Assigned

  
Alan W. Cook, District Judge (Ret.),  
Specially Assigned

NOTICE: This opinion is subject to motions for reargument under V.R.A.P. 40 as well as formal revision before publication in the Vermont Reports. Readers are requested to notify the Reporter of Decisions, Vermont Supreme Court, 109 State Street, Montpelier, Vermont 05609-0801 of any errors in order that corrections may be made before this opinion goes to press.

2011 VT 10

No. 2009-035

VERMONT SUPREME COURT  
FILED IN CLERK'S OFFICE

FEB 4 2011

Robert E. Zorn

v.

S. Scott Smith

Mary Miles Teachout, J.

Robert E. Zorn, Pro Se, Middletown Springs, Plaintiff-Appellant.

S. Scott Smith, Pro Se, Rutland, Defendant-Appellant.

Supreme Court

On Appeal from  
Rutland Superior Court

November Term, 2009

PRESENT: Dooley, Johnson and Burgess, JJ., and Crawford, Supr. J. and Cook, D.J. (Ret.),  
Specially Assigned

¶ 1. **BURGESS, J.** Plaintiff Robert E. Zorn appeals pro se from an order prohibiting him from filing any additional documents with the Rutland Superior Court clerk except through a licensed attorney. We affirm the trial court's order except in two respects. First, the order is clarified to limit its pleading restriction to this particular case and, second, the order is modified to permit Zorn to demonstrate financial inability, if any, to comply with the order.

¶ 2. This case began in September 2000, when Zorn, then represented by counsel, sued defendant Smith for legal malpractice. It was alleged that he paid Smith a retainer and Smith agreed to file a complaint on Zorn's behalf in a defective-automobile case. Smith told Zorn that the complaint had been filed when in fact it had not, and due to Smith's inaction, the statute of limitations ran on the claim. Zorn moved for summary judgment on his malpractice

claim, which Smith did not oppose. The court thus granted summary judgment to Zorn and in an August 2001 order, it awarded him \$26,108.00, plus interest.

¶ 3. In January 2002, Zorn entered a pro se notice of appearance and filed a motion for trustee process, seeking to collect the judgment from Smith. See V.R.C.P. 4.2. Smith did not appear at a hearing scheduled on the motion, but agreed in late January to respond to post-judgment interrogatories. The court scheduled an April 2002 hearing on Zorn's motion for financial disclosure. Smith again failed to appear, and a warrant issued for his arrest. Served with the warrant, Smith personally appeared before the court to state that he had not received notice of the hearing and had not received any interrogatories from Zorn. The court vacated the warrant. At a subsequent hearing on April 23, 2002, the parties agreed that Smith would submit a payment plan or respond to the financial discovery requests within thirty days. There is no evidence that Smith honored this agreement.

¶ 4. No action appears in the case over the next four years until October 2006, when Zorn requested and ultimately obtained a writ of execution on the judgment. The writ was served on Smith in January 2007, and returned with a payment of \$50, leaving an outstanding balance, including interest, of \$43,448.22. In September 2007, Zorn filed a motion for criminal contempt, alleging that Smith had failed to make any payments toward the debt or disclose financial documents as ordered. The court denied the motion, explaining that only civil contempt was available to Zorn under the rules.

¶ 5. Zorn filed another motion for contempt in March 2008, as well as a motion for renewal of judgment and an "ancillary amended complaint" naming the trial judge as a defendant. In May 2008, Zorn filed a "motion for summary judgment." The motions were largely incomprehensible. The motion for contempt, for example, stated that: "since the boycotting of Smith the defendant is under larceny by extortion Model Penal Code 223.4 as well as the court's failure to find that Smith was in his official capacity in part at the time of the

fraud.” The court noted, correctly, that there was no legal basis for amending complaints and moving for summary judgment six to seven years after final judgment had been entered in the case. The filings are replete with claims that Smith engaged in conspiracy, racketeering, and organized crime, and that the trial judge was complicit in such acts.

¶ 6. Treating the “amended complaint” as a motion to disqualify the trial judge, she referred the matter to the administrative judge. See V.R.C.P. 40(e). Disqualification was denied in September 2008. In the meantime, in June and September 2008, Zorn filed more papers with the superior court about complaints made to the FBI and IRS over the court’s denial of his motions, claiming the court’s actions were unconstitutional, conspiratorial, and treasonous. What the court was expected to do with these filings was not clear, except that Zorn sought “revestment” of his judgment order. Also in September 2008, Zorn filed another motion for summary judgment “pursuant to new facts,” but reflecting old history and requesting no relief actionable under law. The court found none of the filings warranted by the rules.

¶ 7. Shortly thereafter, Zorn filed a “motion in opposition” to the administrative judge’s order and a motion for “entry by default for summary judgment.” These requests were denied. In December 2008, Zorn filed a document entitled “Motion to compel summary judgment by violation of the State of Vermont and or officials as judges to violate higher Court orders and Supreme Court orders.” Zorn also sought an interlocutory appeal, which was denied.

¶ 8. In January 2009, the court issued two orders. One denied Zorn’s contempt motion for discovery violations for lack of any underlying orders or requests for discovery. The second denied Zorn’s renewal-of-judgment motion for lack of a new and necessary complaint on the debt, but outlined the method by which Zorn could refresh his judgment against Smith.

¶ 9. In a separate order, the court directed Mr. Zorn to show cause, in five pages or less, why he should not be sanctioned under Vermont Rule of Civil Procedure 11(c) for filing five motions between March 2008 and September 2008 lacking legal and evidentiary support.

The procedural and substantive deficiencies in these filings were spelled out. Instead of addressing the court's order, Zorn submitted another lengthy filing expressing frustration with the court's failure to enforce the arrest warrant vacated seven years earlier, and reiterating his allegations of "extortion," "racketeering," and a "fully orchestrated conspiracy" between Smith and the judges.

¶ 10. In its subsequent January 2009 order, the court sanctioned Zorn under Rule 11 for violating the rules' pleading and procedural requirements. Continuous dealing with Zorn's repetitive and unwarranted motions, the court reasoned, would undermine its allocation of resources to promote the interest of justice for all litigants. The court concluded that the conduct described in its earlier order violated Rule 11(b)(2) and (b)(3) and that sanctions should be imposed.

¶ 11. Turning to an appropriate sanction, the court recognized that its order must be "limited to what is sufficient to deter repetition of such conduct." V.R.C.P. 11(c)(2). It expressly sought to deter future repetitive and unwarranted filings, while allowing Zorn court access. Based on these considerations, the court directed that the Rutland Superior Court clerk "refuse to accept for filing any future pleading, petition, complaint, motion, letter, or other document from Mr. Zorn unless signed by an attorney licensed to practice in the State of Vermont in accordance with Rule 11." The court explained that its sanction would help ensure prospective compliance with the requirements of Rule 11(b) and deter repetitive filings, while permitting access to the court. This appeal followed.

¶ 12. Zorn's submissions on appeal largely mirror his filings below. There are extensive allegations of misconduct by the judges who have dealt with this and his other cases.

The briefing is generally difficult to follow, as in the following statement of the case:

The Rutland County Superior Judge Teachout, has a continuous prejudice of against plaintiff appellant, uncontested by her outrages, acts of defiance [sic] of the rights to join the partys [sic], herself, and the judges, in which she states the plaintiff appellant is

frustrated by her actions, which is total destruction of the due process rights of the contract rights of mandate rule . . . .

Nevertheless, we infer a challenge to the court's imposition of its sanction under Rule 11(c), and address that issue. See Beyel v. Degan, 142 Vt. 617, 619, 458 A.2d 1137, 1138 (1983) (mindful of appellant's pro se status, the Court reluctantly addresses issues apparently raised on appeal, notwithstanding appellant's failure to comply with appellate rules on adequate briefing).

¶ 13. We affirm the trial court's decision as fully within its discretion, see State v. Delaney, 157 Vt. 247, 256, 598 A.2d 138, 143 (1991) (Supreme Court reviews decision to impose sanctions under Rule 11 for abuse of discretion), except in two particulars. First, absent finding a broader pattern of pleading misconduct beyond this case, the sanction needs to be limited to this case and matters properly arising within this case only. Second, the sanction as issued would preclude Zorn from even a cogent claim of indigence, so it must be modified to allow Zorn the opportunity to assert and demonstrate, pro se, that he is without the resources to comply with the court's order.

¶ 14. Otherwise, the trial court's process was authorized. Under Rule 11, any document submitted to the court is certified to present allegations supported by evidence and legal contentions warranted by law. V.R.C.P. 11(b)(2), (3). Upon belief that these requirements have been violated, the court may issue an order describing the specific conduct in question and direct a party to show cause why no violation should be found. V.R.C.P. 11(c)(1)(B). After considering the party's response, the court may impose a sanction that is "limited to what is sufficient to deter repetition of such conduct." V.R.C.P. 11(c)(2). The superior court followed this procedure.

¶ 15. Sanction by the court was warranted under the rule. The court identified five filings that plainly violated Rule 11. The filings were repetitive and unsupported by fact or law. These findings are not discernibly challenged on appeal. In response to the show cause order, Zorn relied on no law or rule to justify his submissions, but instead offered more of the same

mere allegations of conspiracy between defendant and virtually every member of the judiciary coming into contact with this or other cases involving him. Presented with just another violation of the sort cited in its show cause order, the court acted within its authority to find that these repeated, unsupported, and largely indecipherable filings earned a sanction under Rule 11(c).

¶ 16. The question of how best to cure such misbehavior posed a challenge. As the court recognized, this case implicates the litigant's access to the courts as well as the judiciary's interest in avoiding diversion of its resources to process pointless papers at the expense of time and justice due other litigants. The right of access to justice is fundamental in our state constitution. See Vt. Const. ch. I, art. 4 (stating that "[e]very person within this state ought to find a certain remedy [for injury], by having recourse to the laws" and that "every person ought to obtain right and justice, freely, and without being obliged to purchase it"); Jacobsen v. Garzo, 149 Vt. 205, 208, 542 A.2d 265, 267 (1988). This right is not unlimited, however, and litigants are not "free to abuse the courts by inundating them with frivolous suits which burden the administration of the courts for no useful purpose." In re Lawsuits of Carter, 510 S.E.2d 91, 93 (Ga. Ct. App. 1998); see also Martin v. District of Columbia Court of Appeals, 506 U.S. 1, 3 (1992) (per curiam) (imposing sanction where petitioner's filings for certiorari review had a deleterious effect on the court's fair allocation of judicial resources).

¶ 17. Limits and burdens on judicial resources are not academic. Our courts are closed one day per month due to extreme fiscal pressure—only recently reduced from one and one-half days' closure. Rule 11 affords the trial court the necessary means to avoid being held hostage by paperwork from vexatious litigants. See, e.g., In re McDonald, 489 U.S. 180, 184 (1989) (recognizing that courts have responsibility to ensure that their "resources are allocated in a way that promotes the interest of justice"). No litigant enjoys a constitutional right to delay justice to others and occupy the court's time with unfounded filings. Others litigating in good faith are entitled to justice in the courts "promptly and without delay." Vt. Const. ch. I, art. 4; see, e.g.,



Peterson v. State, 817 So.2d 838, 840 (Fla. 2002) (explaining that to further right of every citizen to have access to the courts, courts must sometimes “limit the filings of individuals who have deluged the Clerk’s office with incomprehensible correspondence, and filed multiple frivolous petitions” (quotation omitted)).

¶ 18. The sanction imposed here was supported and reasonable under the circumstances, when limited to this case and provided that Zorn has the opportunity to prove a lack of means necessary to comply with the court’s order. Essentially, the superior court enjoined Zorn from appearing pro se. The Second Circuit offers a useful summary of factors employed by courts in judging whether a pre-filing injunction against a litigant is warranted:

(1) the litigant’s history of litigation and in particular whether it entailed vexatious, harassing or duplicative lawsuits; (2) the litigant’s motive in pursuing the litigation, e.g., does the litigant have an objective good faith expectation of prevailing; (3) whether the litigant is represented by counsel; (4) whether the litigant has caused needless expense to other parties or has posed an unnecessary burden on the courts and their personnel; and (5) whether other sanctions would be adequate to protect the courts and other parties.

Safir v. U.S. Lines, Inc., 792 F.2d 19, 24 (2d Cir. 1986). The ultimate question is “whether a litigant who has a history of vexatious litigation is likely to continue to abuse the judicial process and harass other parties.” Id. The Safir analysis strikes an appropriate balance between a litigant’s right of access to the courts and the court’s need to protect itself as an institution and other parties from the waste of judicial resources.

¶ 19. Applying the Safir factors, we conclude the court acted within its discretion in restricting, while not barring, Zorn from filing additional materials in this case. The recent history of this litigation reflects a pattern of chronic vexatious, baseless, and frivolous filings. The superior court’s conclusions that Zorn’s claims are fantastic and without any good faith basis are supported by the content of the filings and is not challenged in any substantive manner by Zorn. The court’s conclusion that his filings present an undue burden on the court is evident

insofar that limited judicial resources devoted to Zorn's filings are wasted and distract from the administration of justice due others. Similarly, this conclusion is not challenged in any particular on appeal. Limits in this case present no "diminution of our support for the principle of free access to the courts," but are properly viewed as furthering the right of access by permitting courts "to devote our finite resources to the consideration of legitimate claims of persons who have not abused the process." Attwood v. Singletary, 661 So. 2d 1216, 1217 (Fla. 1995); see also De Long v. Hennessey, 912 F.2d 1144, 1148 (9th Cir. 1990) ("Flagrant abuse of the judicial process cannot be tolerated because it enables one person to preempt the use of judicial time that properly could be used to consider the meritorious claims of other litigants.").

¶ 20. The reasonable expectation of the trial court, given Zorn's habit, was that Zorn would continue to file unreasonable and wasteful motions, demands, and papers. Baseless submissions were, at this point, serial. Zorn ignored instructions offered by the trial court on how to pursue collection on his judgment according to law. When told what was wrong with his previous submissions, and in the face of an order to show cause why he should not be sanctioned for repeatedly filing papers in violation of the rules, Zorn violated the rules again.

¶ 21. Zorn's persistent disregard may stem from frustration with the court in collecting what he is owed. Even so, whatever impediments Zorn has to abiding by the rules do not require that the judiciary and the public simply accommodate his violations. After demonstrating his commitment to violating Rule 11, Zorn earned a Rule 11 sanction. See Urban v. United Nations, 768 F.2d 1497, 1499 (D.C. Cir. 1985) (per curiam) (finding that litigant's numerous allegations lacked even an arguable basis in law and fact and justified sanctions); Miles v. Angelone, 483 F. Supp. 2d 491, 496 (E.D. Va. 2007) (mem.) (upholding sanctions where petitioner continued to reassert claims that the State committed fraud, his claims had been rejected repeatedly, and the court could determine no "good-faith basis for continuing to pursue these matters").

¶ 22. Zorn is not assisted by counsel, and although pro se litigants receive some leeway from the courts, they are still “bound by the ordinary rules of civil procedure.” Vahlteich v. Knott, 139 Vt. 588, 591, 433 A.2d 287, 288 (1981). These include the obligations of Rule 11 and sanctions for noncompliance. See Pandozy v. Segan, 518 F. Supp. 2d 550, 557-58 (S.D.N.Y. 2007) (stating that the “special solicitude that a pro se plaintiff must face does not extend to the willful, obstinate refusal to play by the basic rules of the system upon whose very power the plaintiff is calling to vindicate his rights.” (quotation omitted)). Zorn’s pro se status is but one factor to consider in deciding whether and how to sanction a litigant; it is no passport to waste the court’s time indefinitely.

¶ 23. Mindful that “broad filing restrictions against pro se plaintiffs should be approached with particular caution,” Cok v. Family Court of Rhode Island, 985 F.2d 32, 35 (1st Cir. 1993) (quotation omitted), we are satisfied, except in the two respects previously noted and discussed further below, that the superior court’s order here is measured and the least restrictive answer to the reasonably anticipated ongoing violation of the rules by Zorn if left to his own devices. See De Long, 912 F.2d at 1149 (stating that “orders restricting a person’s access to the courts must be based on adequate justification supported in the record and narrowly tailored to address the abuse perceived”); Cok v. Read, 770 A.2d 441, 444 (R.I. 2001) (recognizing that to preserve resources, courts may place “reasonable limits on the filings of litigants who abuse the judicial system” but that “such a sanction should be drawn narrowly” so as not to “impermissibly infringe upon a litigator’s right of access to the courts” (quotation omitted)). Zorn’s access to justice is preserved, while the court’s resources are not occupied by deciphering papers to no useful purpose. Zorn proffers no less restrictive and effective solution.

¶ 24. The dissent contends that lesser sanctions, like fines or preapproval of Zorn’s motions, should be exhausted before resorting to the trial court’s bar of further filings without a lawyer. Less restrictive measures might be appropriate in a different case, but the record of

waste and recalcitrance here supports the conclusion that lesser sanctions would likely be futile. Moreover, monetary penalties or judicial previews would mean more, rather than less, judicial investment in wasteful filings. Fines would necessitate hearings on ability to pay and willfulness. Preapproval requires additional court time devoted to evaluating, again, the substance of filings. Neither of these options would advance the litigation, and, given Zorn's pattern of unsubstantiated filings, both would result in further waste. The lesser sanction of preapproval was imposed on Zorn in another case, as pointed out by the dissent, post, ¶ 30, but to no lasting effect in this matter. Choosing, instead, what it perceived to be a more effective approach was no abuse of discretion by the trial court.

¶ 25. Nor, as characterized by the dissent, is the imposition of a lawyer an abdication of the court's screening function—especially in this case, where the court repeatedly screened Zorn's pro se submissions and determined them baseless. Courts rely daily on attorneys to file pleadings and papers that are not entirely wasteful of courts' time. Attorneys are obligated not only under Rule 11, but by their licensure as well, to assure that their submissions meet minimum standards of substance. See V.R.Pr.C. 3.1 (prohibiting unfounded and frivolous claims or defenses); id. 8.4(d) (defining professional misconduct to include “conduct that is prejudicial to the administration of justice”). Given Zorn's continuing violations, it was not unreasonable for the court to interpose a lawyer's certification between Zorn and the court's mail slot.

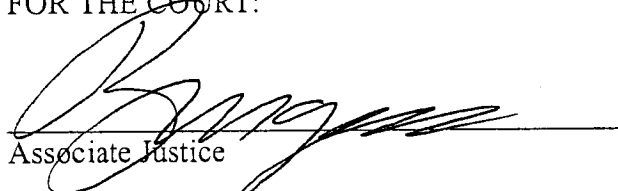
¶ 26. As previously noted, however, applying the sanction to “any pleading, complaint, motion, letter or other document” in Rutland Superior Court as currently set forth in the order is overbroad. There are no findings below of similar abuses by Zorn in other litigation. On this record, it is not evident that his frustration in this case is, or would be, so expressed in others. Accordingly, the sanction is revised to apply only to this case and any derivatives raising the same claims. In other words, only matters stemming from the original Zorn v. S. Scott Smith litigation, which were raised or could have been raised in the past, are subject to this sanction.

¶ 27. Should Zorn's violation of the rules become evident in other cases, the superior court can extend its sanction as appropriate.

¶ 28. The sanction also requires revision to permit Zorn, pro se, to assert and prove that he is without the means to retain an attorney as necessary to comply with the order. If indigent or without viable resources, the sanction as written would deny Zorn access to justice. Zorn is in the best position to know and marshal the evidence of his means and efforts to secure legal assistance. It is left to Zorn to move for reconsideration on those grounds, should he be inclined to do so.

The trial court's decision is affirmed, as modified to explicitly limit its application to this case and to allow Zorn the opportunity to move for reconsideration due to inability to afford counsel.

FOR THE COURT:

  
Associate Justice

¶ 29. **DOOLEY, J., dissenting.** No lawyer in the State of Vermont has the obligation to ensure that this plaintiff, or any other person, obtains access to the courts for purposes of presenting a meritorious or arguably meritorious case. Lawyers are private actors who extend, or refuse to extend, legal services based on many considerations, including economic reward and ability to get along with the client. Even lawyers in publicly-funded agencies created to extend legal services to the indigent have the ability to refuse to accept prospective clients for reasons not based on the merits of the client's case. The sanction in this case, even as diluted by the majority, fundamentally transfers the responsibility of the Vermont Judiciary to provide "right and justice" to "every person" to private actors who do not have to honor the constitutional mandate and against whom plaintiff has no remedy if they fail to assist plaintiff's access to the courts. See Vt. Const. ch. I, art. 4. As the initial decision in Procup v. Strickland, 760 F.2d

1107, 1110 (11th Cir. 1985), observed, the restrictive injunction used in this case “is an ominous abandonment of judicial responsibility, the import of which far exceeds the actual abuse attributable even to the exceptional [pro se] litigant.” The sanction can be, and will be, the functional equivalent to a prohibition of the use of the courts within its terms, a clear violation of Article 4. This is the fundamental reason for this dissent.

¶ 30. The majority upholds the restrictive injunction because “the superior court’s order here is measured and the least restrictive answer to the reasonably anticipated ongoing violation of the rules by plaintiff if left to his own devices.” Ante, ¶ 23 (emphasis added). In fact, the injunction issued here is the most restrictive sanction possible exactly because it limits plaintiff’s access to the courts with no judicial review. In facing what it deemed similar circumstances involving litigation by this plaintiff, the United States District Court for the District of Vermont imposed a less restrictive sanction of requiring judicial approval of plaintiff’s filings before they are accepted. See Zorn v. Brown, File No. 1:05-CV-297 (D. Vt. Nov. 30, 2005) (doc. 50). Exactly because that sanction involves court review of plaintiff’s filings to ensure they are not frivolous or otherwise unmeritorious, it is significantly less restrictive than the one imposed in this case. The Eleventh Circuit rejected the sanction of requiring lawyer representation as a prerequisite to future filings because it unduly burdened litigant’s access to the courts.<sup>1</sup> See

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<sup>1</sup> I recognize that some courts have upheld prefiling restrictions of this type, although generally on records more extreme than the one before us. See People v. Spencer, 524 P.2d 1084, 1086-87 (Colo. 1974); Attwood v. Eighth Circuit Court, 667 So. 2d 356, 357 (Fla. Dist. Ct. App. 1995) (per curiam) (upholding injunction against further pro se filings as necessary due to litigant’s daily incomprehensible and frivolous filings); Spremo v. Babchik, 589 N.Y.S.2d 1019, 1023-24 (Sup. Ct. 1992) (holding that the right of access is not unlimited and must bend when litigant’s repetitive and frivolous filings “deprives other litigants of their proper share of judicial resources”). Apart from the differences in the controlling facts, these decisions differ in two respects. First, several are based on the reasoning that the judiciary can control the conduct of lawyers, but not pro se litigants, so that the proper remedy must involve the presence of a lawyer. See Spremo, 589 N.Y.S.2d at 1025. The 1984 amendment to Rule 11, which made self-represented litigants subject to the rule and imposed the same standards of conduct on them as on lawyers, was intended to respond to this perceived limitation. See Reporter’s Notes—1984 Amendment, V.R.C.P. 11. Both the 1984 and 1996 amendments to the rule made the sanctions more flexible and meaningful. See id.; Reporter’s Notes—1996 Amendment, V.R.C.P. 11. The



Procup v. Strickland, 792 F.2d 1069, 1074 (11th Cir. 1986) (per curiam) (en banc); Procup, 760 F.2d at 1116.

¶ 31. While the foregoing paragraphs represent the fundamental reason for my disagreement with the majority decision, it is not the only reason. I agree that plaintiff's actions warrant a sanction for violation of Rule 11. I also agree that under the Safir factors the case has reached the point where a restrictive injunction may be necessary. See Safir v. U.S. Lines, Inc., 792 F.2d 19, 24 (2d Cir. 1986). In my judgment, however, sanctions should occur earlier and escalate to a restrictive injunction only if lesser sanctions fail. I think this point is particularly appropriate in this very unusual case.

¶ 32. In stating my disagreement, I start with the fundamental principles that have to govern our actions. Vermont Rule of Civil Procedure 11(c)(2) authorizes a sanction for violation of its requirements but limits the sanction "to what is sufficient to deter repetition of such conduct." (Emphasis added.) This means that the court must chose a sanction that is the "least restrictive, but effective, means of protecting the courts." Brady v. Marks, 7 F. Supp. 2d 247, 255 (W.D.N.Y. 1998). Restricting a litigant's access to the courts is a particularly severe remedy that must be used rarely and with great caution. See Cromer v. Kraft Foods N. Am., Inc., 390 F.3d 812, 817 (4th Cir. 2004) ("Such a drastic remedy must be used sparingly, . . . consistent with constitutional guarantees of due process of law and access to the courts."). This is especially true when, as here, the litigant proceeds pro se. Pavilonis v. King, 626 F.2d 1075, 1079 (1st Cir. 1980) (explaining that "use of [prefiling injunction] against a pro se plaintiff should be approached with particular caution" and should "remain very much the exception to

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strengthening of Rule 11 weakened this justification for requiring the appearance of a lawyer as a sanction. Second, courts imposing a required-lawyer sanction do not generally adhere to the policy that any sanction must be the least restrictive possible. Some say so explicitly. See State ex rel. Bardacke v. Welch, 698 P.2d 462, 467 (N.M. Ct. App. 1985) (explaining that "less restrictive method of regulating access is not required when the facts show a pattern of conduct which is either vexatious, oppressive or for the purpose of harassment"). Even as recognized by the majority, Vermont law requires that a sanction be "the least restrictive" means available. See ante, ¶ 23.

the general rule of free access to the courts”). Generally, a court should start with a less restrictive sanction and escalate its sanction response only once those other methods are proven ineffective. See Freeze v. Griffith, 849 F.2d 172, 176 (5th Cir. 1988) (assessing costs against pro se plaintiff for filing frivolous repetitive appeals and warning that “further frivolous appeals will result in escalating sanctions”).

¶ 33. Because it presents circumstances rarely, if ever, present in cases involving sanctions for frivolous filings, this is a very unusual case in three ways. First, it started as a clearly meritorious case. Plaintiff obtained a judgment against a lawyer for malpractice and proceeded to try to enforce it. While plaintiff’s pro se maneuvering was ineffective and counterproductive, and the judgment may have become stale, this was not a frivolous case against the original defendant, S. Scott Smith.

¶ 34. Second, plaintiff has been a frequent, and often successful, pro se litigant in the Vermont courts. Plaintiff here instigated fourteen other cases, filed during the period from July, 1989 through July, 2005.<sup>2</sup> In all but one of these cases, plaintiff appeared pro se. In eight of the fourteen cases, he won a favorable judgment, usually for a relatively small monetary amount. He prevailed in one of two cases brought as small claims.

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<sup>2</sup> This information comes from Vermont Courts On-Line which has docket sheets for civil and small claims cases filed in twelve of the fourteen superior courts in Vermont. This information is publicly accessible from the Vermont Courts On-Line website. See <https://secure.vermont.gov/vtcdas/user>. A number of decisions have held that a trial court must gather this kind of information before issuing a restrictive filing injunction of the type before us now, see, e.g., Jordan v. State, 110 P.3d 30, 43 (Nev. 2005), abrogated on other grounds by Buzz Stew, LLC v. City of N. Las Vegas, 181 P.3d 670 (Nev. 2008), but the superior court never did so. Although the issue arose in an adversary proceeding, defendant did not offer any substantive argument regarding the injunction, and therefore the parties have not provided this Court with the relevant information. In these circumstances, the trial court and this Court must be free to go to the public records to determine the issue.

The court’s order in this case precedes court unification in Vermont that eliminated the district and family courts so at the time the superior court’s jurisdiction was over only civil and small claims cases. Therefore, I interpret the order on appeal as covering only these case types and have looked only at them.

¶ 35. Third, plaintiff has not appeared in forma pauperis in this or any of the other cases. He has paid considerable money in filing fees over the years and continues to pay those fees. Thus, there is every indication that he is capable of paying a monetary sanction, but that form of sanction was never imposed upon him.

¶ 36. In a fourth way, the case is not unusual. Plaintiff's filings have become more and more incoherent and erratic in recent years. This is not the only case in which such behavior has occurred. As a consequence, the same trial judge issued a similar order against plaintiff in another case. Zorn v. Ryan, No. 327-7-05 Wrcv (Vt. Super. Ct. Oct. 6, 2008). In a non-precedential order, a three-justice panel of this Court upheld the order, in part because plaintiff did not explicitly challenge it. Zorn v. Ryan, No. 2008-445 (Vt. April 15, 2009) (unpub. mem.), available at <http://www.vermontjudiciary.org/d-upeo/eo08-445.pdf>.

¶ 37. Finally, I think we also have to acknowledge a fifth factor because it is obvious although unstated by the trial court or by the majority. Whenever someone has tried to help plaintiff, that person has ended up as the latest defendant in plaintiff's latest amended complaint. For example, Superior Judge Harold Eaton, when reviewing a recusal motion against a trial judge in this case, went out of his way to explain exactly what plaintiff should do to enforce his judgment. Plaintiff never acted on the advice but added Judge Eaton to the list of alleged conspirators against plaintiff. In these circumstances, no lawyer is likely to step forward to represent plaintiff.<sup>3</sup> The order the majority affirms, even as modified, is thus de facto a prohibition on any further filings in this case, which is impermissible. See Peoples v. State, 531 So. 2d 323, 326 (Ala. Crim. App. 1988) (concluding that an order that prohibited filing any motion or pleading in three cases was overbroad and remanding for a less-restrictive sanction);

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<sup>3</sup> This Court referred plaintiff to Vermont Legal Aid, Inc. and requested the Vermont Volunteer Lawyers Project (VVLP) to find a volunteer lawyer to represent plaintiff in this Court. VVLP was unable to find a pro bono lawyer who would take the case. This Court was not informed of the result of the referral to Vermont Legal Aid, but no lawyer from that program entered an appearance for plaintiff.

Holt v. State, 232 P.3d 848, 855 (Kan. 2010) (“Blanket prohibitions, however, would deny a party’s future access to the courts and constitute an over extension of the inherent authority”); Switzer v. Switzer, 641 S.E.2d 80, 84 (Va. 2007) (“[A]ppellate courts generally are in agreement that courts may not completely prohibit future pro se filings by litigants who have filed repeated frivolous cases or motions.”). The superior court stated in its decision that the sanction would “help to ensure prospective compliance with the requirements of Rule 11(b) and deter repetitive filings, while permitting Mr. Zorn continued access to the courts.” I do not think that the last phrase of that rationale can be squared with the reality of the circumstances before us.

¶ 38. This point puts ¶ 24 of the majority decision in perspective. In essence, the majority is saying that no alternative sanction is appropriate because the alternatives do not make plaintiff go away, never to be seen (at least by the judge) again. Thus, the court says a filing pre-approval requirement is inappropriate because it “requires additional court time devoted to evaluating, again, the substance of filings.” Ante, ¶ 24. Under this philosophy the most restrictive possible sanction becomes the least restrictive possible sanction because the sanction must ensure that the trial judge never has to see the pro se litigant again and has no responsibility for whether the litigant has access to justice for a meritorious claim. In my judgment, this is a fundamental abandonment of judicial responsibility that cannot be squared with plaintiff’s constitutional right of access to the courts in Chapter I, Article 4 of the Vermont Constitution.

¶ 39. The majority claims that the sanction is not unduly restrictive because courts “rely daily on attorneys to file pleadings and papers that are not entirely wasteful of courts’ time.” Ante, ¶ 25. The truth of this statement does little to alleviate my concerns. While lawyers are certainly obligated to ensure that any filing they make is not frivolous, there is no reverse obligation. That is, lawyers are not required to file everything that is nonfrivolous. The fact remains that plaintiff may have a legitimate complaint, but be unable to find an attorney to represent his interests, and therefore his access to the courts will be denied.

¶ 40. In this case, the superior court did not act when plaintiff started to commence frivolous filings and finally acted to employ the most restrictive sanction possible with no consideration of a less restrictive sanction. I recognize that these five considerations make this a hard case, perhaps the textbook case on the pitfalls of dealing with pro se litigants. But several other options were available to the court, particularly if the court had acted earlier. The en banc decision in Procup contains a summary description of the types of sanctions that have been employed by courts in circumstances comparable to those present here.<sup>4</sup> See Procup, 792 F.2d at 1072-73. The most common sanction for a violation of Rule 11 is monetary. Rule 11(c)(2) specifically authorizes the court to order the offending party “to pay a penalty into court.” Especially early in the escalation of plaintiff’s filings, it is possible that a monetary sanction would have deterred plaintiff’s conduct. See Golyar v. McCausland, 738 F. Supp. 1090, 1098 (W.D. Mich. 1990) (imposing monetary sanction against pro se plaintiff for filing repetitive frivolous law suit). For example, the court could have required plaintiff to pay escalating monetary sanctions as a condition of further filings. As long as plaintiff had the ability to pay those amounts, such a sanction would be far less restrictive than that ultimately imposed.

¶ 41. As an alternative, the court could have imposed a leave-to-file requirement on plaintiff. Procup, 792 F.2d at 1073 (listing as a sanction option having the court review pleadings prior to filing). As noted above, the United States District Court for the District of Vermont sanctioned plaintiff in this manner in a different case by restricting him from filing new cases or pleadings in cases without prior approval of the court. See Zorn v. Brown, File No. 1:05-CV-297 (D. Vt. Nov. 30, 2005) (doc. 50). There is no good reason why such a sanction could not have been used here. The majority’s conclusion that such lesser sanctions would have been “futile” is nothing more than conjecture. Ante, ¶ 24. Rather than speculate on the outcome,

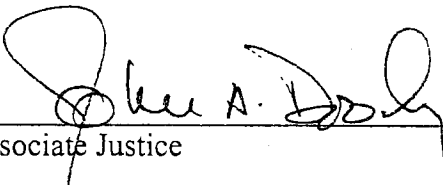
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<sup>4</sup> Procup involves cases filed by prisoners so its facts are significantly different from those in this case. Nevertheless, the policy issues and the application of the proper policy are the same.

especially about a right as important as access to the courts, plaintiff is entitled to an opportunity to demonstrate compliance. Further, I am not persuaded by the majority's assessment that preapproval is not an option because of the drain on judicial resources. I cannot believe that a summary review of plaintiff's attempted filings to ensure there is a new and arguably meritorious claim contained therein is such a drain on judicial resources that it will interfere with the processing of other cases in the court.

¶ 42. In sum, I dissent because the sanction upheld, even as narrowed by the majority, is the most restrictive sanction a court can impose short of an outright prohibition on future access to the court and in this case is de facto such a prohibition. It is inconsistent with the right of access for all litigants contained in Chapter I, Article 4 of the Vermont Constitution. It was imposed with no consideration of less restrictive alternatives, and less restrictive alternatives exist in this case. I would reverse and remand for consideration of those alternatives.

¶ 43. I am authorized to state that Justice Johnson joins this dissent.

  
Associate Justice



**MANDATE**

**United States Court of Appeals**

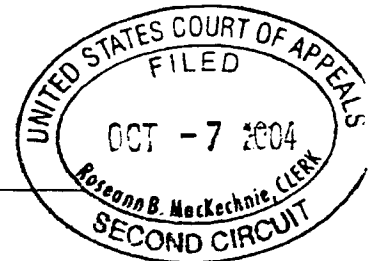
FOR THE  
SECOND CIRCUIT

Vermont  
99-cv-160  
Murtha

At a stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, Foley Square, in the City of New York, on the 7<sup>th</sup> day of October, two thousand and four.

Before: Hon. Joseph M. McLaughlin,  
Hon. José A. Cabranes,  
Hon. Robert D. Sack,  
Circuit Judges

Docket Nos. 02-6201 (L), 02-6150 (XAP), 02-6199 (CON), 03-6059 (CON)



SCOTT HUMINSKI,

Plaintiff-Appellant-Cross-Appellee,

v.

HON. NANCY CORSONES, HON. M. PATRICIA ZIMMERMAN, KAREN PREDOM,

Defendants-Appellees-Cross-Appellants,

SHERIFF R.J. ELRICK and RUTLAND COUNTY SHERIFF'S DEPARTMENT,

Defendants-Appellees.

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED  
2005 MAR 17 AM 8 29  
CLERK  
BY CSB  
DEPUTY CLERK

Appeal from the United States District Court for the District of Vermont.

This cause came on to be heard on the transcript of record from the United States District Court for the District of Vermont and was argued by counsel.

On consideration whereof, it is hereby ORDERED, ADJUDGED and DECREED that the judgment of said district court be and it hereby is AFFIRMED in part; VACATED and REMANDED in part in accordance with the opinion of this Court.

FOR THE COURT:  
ROSEANN B. MACKECHNIE, Clerk  
by

Tracy W. Young  
Tracy W. Young  
Motions Staff Attorney

A TRUE COPY  
Roseann B. MacKechnie, CLERK

by B. W. H.  
DEPUTY CLERK

ISSUED AS MANDATE


MAR - 3 2005

**ORIGINAL PAPER**  
RUTLAND SUPERIOR COURT

State of Vermont  
Rutland County, ss

DEC 17 2001

Robert Zorn

  
Docket No. 488-8-01Rdcv

v.

Birger-Heffemehe, a/k/a Birger Heffemehl,  
Heberle Mollow, a/k/a Heberle Mollo  
a/k/a Heverle Mollow a/k/a Hebbi Mollo, and  
Nancy Heverle Grayson

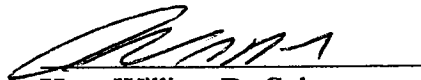
ORDER RE: BIRGER HEFFERMEHE a/k/a BIRGER HEFFEMEHL

This Court's order dated September 7, 2001, required Birger Heffemehe, a/k/a Birger Heffermehl, to "immediately" remove the sand and gravel he had placed on Plaintiff's land. Upon notice and hearing, the Court finds Birger Heffemehe in contempt of court for willful violation of this provision of the Court's order dated September 7, 2001.

The court awards damages against Mr. Heffemehe to Robert Zorn in the amount of \$4,900 (four thousand, nine hundred dollars).

The court also imposes a fine of \$100 (one hundred dollars) per day, for every day after December 1~~9~~, 2001 (i.e., starting on midnight at the end of the day of December 1~~9~~, 2001), that Mr. Heffemehe has not removed the sand and gravel as set forth in the Court's order dated September 7, 2001. This fine is payable to Rutland Superior Court.

Date: December 17~~th~~, 2001

  
Hon. William D. Cohen  
Superior Judge

STATE OF VERMONT  
RUTLAND COUNTY, SS.

RUTLAND SUPERIOR COURT

ROBERT ZORN,  
PLAINTIFF  
v,

ORIGINAL PAPER  
RUTLAND SUPERIOR COURT

Docket no: 50238-88 RLC

OCT 12 1992

ROBERT AND DORIS REES,  
DEFENDANTS

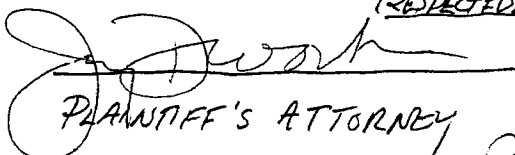
Gayd. Johnson  
Clerk

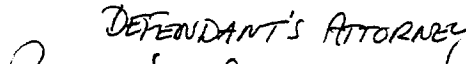
SETTLEMENT

Now Come the above captioned parties  
by and through their attorneys, Jeremy Dworkin,  
David Reid, and Jonathan Block for the  
plaintiff, and Theodore Parisi for the  
defendants, and agree to the following as  
a final settlement of this matter, and the parties  
agree to execute mutual releases of all claims to date hereof:

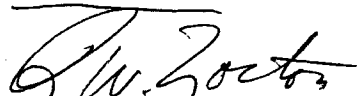
- (1) Defendants agree to release to plaintiff  
all monies and interest in the  
escrow account # 15-5-06169,  
Money Market Account at First National  
Bank of Vermont, forth with;
- (2) This settlement is to remain confidential;
- (3) Parties agree that the suit and  
counter-suit may be dismissed with  
prejudice.

DATED: OCTOBER 12, 1992 at Rutland, Vermont  
RESPECTFULLY SUBMITTED:

  
PLAINTIFF'S ATTORNEY

  
DEFENDANT'S ATTORNEY  
Paul S. Huntley

SO ORDERED:

  
SUPERIOR COURT  
JUDGE

STATE OF VERMONT  
RUTLAND COUNTY, SS.

RUTLAND SUPERIOR COURT  
DOCKET NO. S238-88Rcj

ROBERT ZORN,  
Plaintiff

v.

ROBERT REES and DORIS REES,  
Defendants

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ORDER

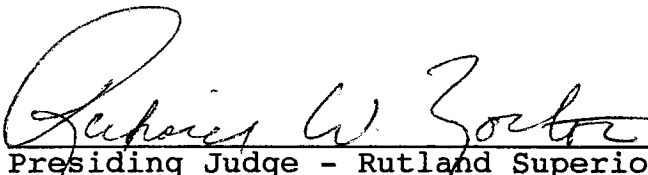
Based on the stipulation of the parties to this action dated October 12, 1992, it is hereby ORDERED, ADJUDGED and DECREED as follows:

1) All claims of the Plaintiff against the Defendants are hereby DISMISSED WITH PREJUDICE;

2) All claims and counterclaims of the Defendants against the Plaintiff are hereby DISMISSED WITH PREJUDICE;

3) Any and all liens, attachments or other impositions against the real estate of the Defendants, Robert Rees and Doris Rees, located in the Town of Pawlet, County of Rutland and State of Vermont, created by the Plaintiff or his attorneys, are hereby terminated and discharged.

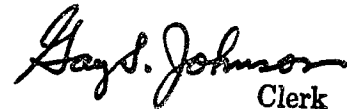
Done at the City of Rutland this 23<sup>rd</sup> day of October, 1992.

  
Presiding Judge - Rutland Superior Court

**ORIGINAL PAPER**  
RUTLAND SUPERIOR COURT

cc: Jeremy Dworkin, Esq.  
David Reid, Esq.

OCT 23 1992

  
Clerk

### • Bipolar I disorder: adjunct maintenance therapy with lithium or divalproex

**Adults:** Initially, 50 mg PO b.i.d. Increase dosage in increments of 100 mg daily in two divided doses up to 200 mg PO b.i.d. on day 4. May increase dosage in increments no greater than 200 mg daily up to 800 mg daily by day 6. Usual dose is 400 to 800 mg daily. For maintenance therapy with lithium or divalproex, continue treatment at the dosage required to maintain symptom remission.

**Adjust-a-dose:** Elderly patients: Titrate on immediate-release formula, starting at 25 mg/day. Use slow titration and regular monitoring. In patients with hepatic impairment, initial dose is 25 mg daily. Increase daily in increments of 25 to 50 mg daily to an effective dose. For debilitated patients and those with hypotension, consider lower dosages and slower adjustment.

### • Depression associated with bipolar disorder

**Adults:** Initially, 50 mg PO once daily at bedtime; increase on day 2 to 100 mg; increase on day 3 to 200 mg; increase on day 4 to maintenance dose of 300 mg.

**Adjust-a-dose:** Elderly patients: Titrate on immediate-release formula, starting at 25 mg/day. Use slow titration and regular monitoring. In patients with hepatic impairment, initial dose is 25 mg daily. Increase daily in increments of 25 to 50 mg daily to an effective dose. For debilitated patients and those with hypotension, consider lower dosages and slower adjustment.

### ADMINISTRATION

- PO.**
- Don't break or crush extended-release tablets.
  - Give drug without regard for food; give extended-release tablets without food or with a light meal (about 300 calories).
  - Schizophrenic patients who are currently being treated with divided doses of the immediate-release form may be switched to extended-release tablets at the equivalent total daily dose taken once daily. Individual dosage adjustments may be necessary. Those requiring less than 200 mg/dose should remain on the immediate-release form.

Reactions may be common, uncommon, life-threatening, or common and life-threatening. Interaction may have a **major**, **minor**, or **delayed onset**.

### ACTION

Blocks dopamine and serotonin 5-HT<sub>1</sub> receptors. Its action may be mediated through this antagonism.

Route	Onset	Peak	Duration
P.O.	Unknown	1½ hr	Unknown
extended-release	Unknown	6 hr	Unknown

**Half-life:** 6 hours, extended-release 7 to 12 hours.

### ADVERSE REACTIONS

**CNS:** dizziness, headache, somnolence, **neuroleptic malignant syndrome**, seizures, hypertension, dysarthria, asthenia, CV: orthostatic hypotension, tachycardia, palpitations, peripheral edema. **EENT:** ear pain, pharyngitis, rhinitis. **GI:** dry mouth, dyspepsia, abdominal pain, constipation, anorexia.

**Hematologic:** leukopenia.

**Metabolic:** weight gain, hyperglycemia.

**Musculoskeletal:** back pain.

**Respiratory:** increased cough, dyspnea.

**Skin:** rash, diaphoresis.

**Other:** flu-like syndrome.

### INTERACTIONS

**Drug-drug:** Antihypertensives: May increase effects of antihypertensives. Monitor blood pressure.

**Carbamazepine, glucocorticoids, phenobarbital, phenytoin, rifampin, thioridazine:** May increase quetiapine clearance. May need to adjust quetiapine dosage.

**CNS depressants:** May increase CNS effects. Use together cautiously.

**Dopamine agonists, levodopa:** May antagonize the effects of these drugs. Monitor patient.

**Erythromycin, fluoxetine, itraconazole, ketoconazole:** May decrease quetiapine clearance. Use together cautiously.

**Lorazepam:** May decrease lorazepam clearance. Monitor patient for increased CNS effects.

**Drug-lifestyle:** Alcohol use: May increase CNS effects. Discourage use together.

### EFFECTS ON LAB TEST RESULTS

- May increase liver enzyme, cholesterol, triglyceride, and glucose levels. May

of treatment, especially in those with major depressive or other psychiatric disorder. ■

### PATIENT TEACHING

- Warn patient about risk of dizziness when standing up quickly. The risk is greatest during the 3- to 5-day period of first dosage adjustment, when resuming treatment, and when increasing dosages.
- Tell patient to avoid becoming overheated or dehydrated.
- Warn patient to avoid activities that require mental alertness until effects of drug are known, especially during first dosage adjustment or dosage increases.
- Remind patient to have an eye examination at start of therapy and every 6 months during therapy to check for cataracts.
- Tell patient to notify prescriber about other prescription or OTC drugs he's taking or plans to take.
- Tell women of childbearing age to notify prescriber about planned, suspected, or known pregnancy.
- Advise women not to breast-feed during therapy.
- Advise patient to avoid alcohol while taking drug.
- Tell patient to take drug with or without food.
- Tell patient not to crush, chew, or break extended-release tablets.
- Tell patient to take extended-release tablets without food or with a light meal.

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### risperidone

ris-PEER-i-dohn

Risperdal, Risperdal Consta

Pharmacologic class:

benzisoxazole derivative

Pregnancy risk category C

### AVAILABLE FORMS

**Injection:** 12.5 mg, 25 mg, 37.5 mg, 50 mg

**Solution:** 1 mg/ml

**Tablets:** 0.25 mg, 0.5 mg, 1 mg, 2 mg, 3 mg, 4 mg

**Tablets (orally disintegrating):** 0.5 mg, 1 mg, 2 mg, 3 mg, 4 mg

◆ Photoguide

\* Liquid contains alcohol.

decrease T<sub>4</sub> and thyroid-stimulating hormone levels.

- May decrease WBC count.

### CONTRAINDICATIONS & CAUTIONS

- Contraindicated in patients hypersensitive to drug or its ingredients.
- Use cautiously in patients with CV disease, cerebrovascular disease, conditions that predispose to hypotension, a history of seizures or conditions that lower the seizure threshold, and conditions in which core body temperature may be elevated.
- Use cautiously in patients at risk for aspiration pneumonia.
- **Black Box Warning:** Drug isn't approved for use in children. ■
- **Overdose S&S:** Drowsiness, hypotension, sedation, tachycardia, hypokalemia, first-degree heart block.

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**INDICATIONS & DOSAGES****Schizophrenia**

**Adults:** Drug may be given once or twice daily. Initial dosing is generally 2 mg P.O. daily. Increase dosage at intervals not less than 24 hours, in increments of 1 to 2 mg/day, as tolerated, to a recommended dose of 4 to 8 mg/day. Periodically reassess to determine the need for maintenance treatment with an appropriate dose.

**Adolescents ages 13 to 17:** Start treatment with 0.5 mg P.O. once daily, given as a single daily dose in either the morning or evening. Adjust dose, if indicated, at intervals not less than 24 hours, in increments of 0.5 or 1 mg/day, as tolerated, to a recommended dose of 3 mg/day. There are no data to support use beyond 8 weeks.

**12-week parenteral therapy for schizophrenia**

**Adults:** Establish tolerance to oral risperidone before giving I.M. Give 25 mg deep I.M. into the buttock every 2 weeks, alternating injections between the two buttocks. Adjust dose no sooner than every 4 weeks. Maximum, 50 mg I.M. every 2 weeks. Continue oral antipsychotic for 3 weeks after first I.M. injection, then stop oral therapy.

**Adjust-a-dose:** Patients with hepatic or renal impairment: Titrate slowly to 2 mg P.O.; if tolerated, give 25 mg I.M. every 2 weeks, or give initial dose of 12.5 mg I.M. Continue oral form of risperidone (or another antipsychotic drug) with the first injection and for 3 subsequent weeks to maintain therapeutic drug levels.

**Monotherapy or combination therapy with lithium or valproate for 3-week treatment of acute manic or mixed episodes from bipolar I disorder**

**Adults:** 2 to 3 mg P.O. once daily. Adjust dose by 1 mg daily. Dosage range is 1 to 6 mg daily. Or, 25 mg I.M. every 2 weeks. Some patients may benefit from a higher dose of 37.5 or 50 mg.

**Adjust-a-dose:** In elderly or debilitated patients, hypotensive patients, or those with severe renal or hepatic impairment, start with 0.5 mg P.O. b.i.d. Increase dosage by 0.5 mg b.i.d. Increase in dosages above 1.5 mg b.i.d. should occur at least 1 week apart. Subsequent switches to once-daily dosing may be made after pa-

tient is on a twice-daily regimen for 2 to 3 days at the target dose.

**Children and adolescents ages 10 to 17:** 0.5 mg P.O. as a single daily dose in either the morning or evening. Adjust dose, if indicated, at intervals not less than 24 hours, in increments of 0.5 or 1 mg/day, as tolerated, to a recommended dose of 2.5 mg/day.

**Irritability, including aggression, self-injury, and temper tantrums, associated with an autistic disorder**

**Adolescents and children age 5 and older who weigh 20 kg (44 lb) or more:** Initially, 0.5 mg P.O. once daily or divided b.i.d. After 4 days, increase dose to 1 mg. Increase dosage further in 0.5-mg increments at intervals of at least 2 weeks.

**Children age 5 and older who weigh less than 20 kg:** Initially, 0.25 mg P.O. once daily or divided b.i.d. After 4 days, increase dose to 0.5 mg. Increase dosage further in 0.25-mg increments at intervals of at least 2 weeks. Increase cautiously in children who weigh less than 15 kg (33 lb).

**Tourette syndrome**

**Adults and children:** Initially, 0.5 to 1 mg P.O. daily. Titrate by 0.5 or 1 mg every 5 days. Average dose is less than 4 mg daily; maximum dose 6 to 9 mg daily.

**ADMINISTRATION****P.O.**

• Give drug without regard for meals.  
• Open package for orally disintegrating tablets (ODTs) immediately before giving by peeling off foil backing with dry hands. Don't push tablets through the foil.

• Phenylalanine contents of ODTs are as follows: 0.5-mg tablet contains 0.14 mg phenylalanine; 1-mg tablet contains 0.28 mg phenylalanine; 2-mg tablet contains 0.56 mg phenylalanine; 3-mg tablet contains 0.63 mg phenylalanine; 4-mg tablet contains 0.84 mg phenylalanine.

**I.M.**

• Continue oral therapy for the first 3 weeks of I.M. injection therapy until injections take effect, then stop oral therapy.

• To reconstitute I.M. injection, inject premeasured diluent into vial and shake vigorously for at least 10 seconds. Suspension appears uniform, thick, and milky; particles are visible, but no dry particles

remain. Use drug immediately, or refrigerate for up to 6 hours after reconstitution. If more than 2 minutes pass before injection, shake vigorously again. See manufacturer's package insert for more detailed instructions.

• Refrigerate I.M. injection kit and protect it from light. Drug can be stored at temperature less than 77° F (25° C) for no more than 7 days before administration.

**ACTION**

Blocks dopamine and 5-HT<sub>2</sub> receptors in the brain.

Route	Onset	Peak	Duration
P.O.	Unknown	1 hr	Unknown
I.M.	3 wk	4–6 wk	7 wk

Half-life: 3 to 20 hours.

**ADVERSE REACTIONS**

**CNS:** akathisia, somnolence, dystonia, headache, insomnia, agitation, anxiety, pain, parkinsonism, neuroleptic malignant syndrome, suicide attempt, dizziness, fever, hallucination, mania, impaired concentration, abnormal thinking and dreaming, tremor, hypoesthesia, fatigue, depression, nervousness.

**CV:** tachycardia, chest pain, orthostatic hypotension, peripheral edema, syncope, hypertension.

**EENT:** rhinitis, sinusitis, pharyngitis, abnormal vision, ear disorder (I.M.).

**GI:** constipation, nausea, vomiting, dyspepsia, abdominal pain, anorexia, dry mouth, increased saliva, diarrhea.

**GU:** urinary incontinence, increased urination, abnormal orgasm, vaginal dryness.

**Metabolic:** weight gain, hyperglycemia, weight loss.

**Musculoskeletal:** arthralgia, back pain, leg pain, myalgia.

**Respiratory:** coughing, dyspnea, upper respiratory infection.

**Skin:** rash, dry skin, photosensitivity reactions, acne, injection site pain (I.M.).

**Other:** tooth disorder, toothache, injury, decreased libido.

**INTERACTIONS**

**Drug-drug:** Antihypertensives: May enhance hypotensive effects. Monitor blood pressure.

**Carbamazepine:** May increase risperidone clearance and decrease effectiveness. Monitor patient closely.

**Clozapine:** May decrease risperidone clearance, increasing toxicity. Monitor patient closely.

**CNS depressants:** May cause additive CNS depression. Use together cautiously.

**Dopamine agonists, levodopa:** May antagonize effects of these drugs. Use together cautiously and monitor patient.

**Tramadol, buprenorphine:** May increase the risk of risperidone's adverse effects, including serotonin syndrome. Monitor patient closely and adjust risperidone dose, as needed.

**Drug-lifestyle:** Alcohol use: May cause additive CNS depression. Discourage use together.

**Sun exposure:** May increase risk of photosensitivity reactions. Advise patient to avoid excessive sunlight exposure.

**EFFECTS ON LAB TEST RESULTS**

• May increase prolactin level. May decrease hemoglobin level and hematocrit.

**CONTRAINDICATIONS & CAUTIONS**

• Contraindicated in patients hypersensitive to drug and in breast-feeding women.

• Use cautiously in patients with prolonged QT interval, CV disease, cerebrovascular disease, dehydration, hypovolemia, history of seizures, or conditions that could affect metabolism or hemodynamic responses.

• Use cautiously in patients exposed to extreme heat.

• Use caution in patients at risk for aspiration pneumonia.

• Use I.M. injection cautiously in those with hepatic or renal impairment.

**Overdose S&S:** Drowsiness, sedation, tachycardia, hypotension, extrapyramidal symptoms, QT-interval prolongation, seizures, torsades de pointes.

**NURSING CONSIDERATIONS**

• **Alert:** Obtain baseline blood pressure measurements before starting therapy, and monitor pressure regularly. Watch for orthostatic hypotension, especially during first dosage adjustment.

■ **Black Box Warning** Fatal cardiovascular or infectious adverse events may occur

Reactions may be common, uncommon, life-threatening, or common and life-threatening. Interaction may have a rapid onset or delayed onset.

(Canada)

◇ OTC

◆ Off-label use

◉ Photoguide

\* Liquid contains alcohol

Form 344

STATE OF VERMONT  
CONDITIONS OF RELEASE ORDER

				Docket Number
Defendant <b>ROBERT E. ZOEN</b>	D.O.B. <b>8/25/51</b>	Unit <b>2</b>	Circuit <b>DISTRICT</b>	Offense <b>SINGLE ASSAULT RESISTING ARREST</b>

The Court has determined that future appearance(s) of the defendant will not be reasonably assured by his/her release on personal recognizance or execution of an unsecured appearance bond alone; or that the release of the defendant will constitute a danger to the public. It is therefore ORDERED that the defendant be released upon the following marked conditions:

You must give the court bail as follows:

- An Unsecured Appearance Bond in the amount of \$ \_\_\_\_\_.
- A Secured Appearance Bond in the amount of \$ 10,000, with a cash or surety deposit of \$ \_\_\_\_\_.
- A Surety Bond or cash in the amount of \$ \_\_\_\_\_.
- A Peace Bond in the amount of \$ \_\_\_\_\_, with a deposit of \$ \_\_\_\_\_.

PROBABLE CAUSE MUST BE FOUND BY A JUDICIAL OFFICER IF HELD ON BAIL FOR MORE THAN 48 HOURS.

- ☒ You must come to court when you are told to.
- ☒ You must give your attorney and the court clerk your address and phone number. If it changes, you must tell them immediately.
- ☒ You must not be charged with or have probable cause found for a new offense while this case is open.
- ☐ You are released into the custody of \_\_\_\_\_.
- ☐ You must report to \_\_\_\_\_ police station/barracks and check in on \_\_\_\_\_ (days) by \_\_\_\_\_ (time) AM/PM.
- ☐ You must live in \_\_\_\_\_ county. You cannot leave the county without the court's permission.
- ☐ You cannot drive any motor vehicle, including a car, truck, or motorcycle.
- ☐ You cannot drive any motor vehicle, including a car, truck, or motorcycle unless you have a valid driver's license, one that is not suspended or expired or revoked.
- ☐ You must submit to an alcosensor when you report to the police station/barracks.
- ☐ You must NOT buy, have or use regulated drugs without a prescription.
- ☐ Curfew: \_\_\_\_\_
- ☐ You must NOT buy, have or drink any alcoholic beverage.
- ☒ You must NOT buy, have or use any firearms or dangerous/deadly weapons.
- ☒ You must NOT have contact with Mr. Osden - wife, which includes in person, in writing, by telephone, by e-mail or through a third person regardless of whether you are in jail or released.
- ☐ You must NOT abuse or harass in any way \_\_\_\_\_ regardless of whether you are in jail or released.
- ☒ You must come to court on 3/31/11 at 1230 AM/PM.
- ☐ You may be arrested without a warrant if you do not abide by Condition(s) No. \_\_\_\_\_.

Other conditions:

**31.** NOT TO ENTER LANDS OR PREMISES AS ORDERED TO INCLUDE HOME  
WORKPLACE

VIOLATIONS OF ANY OF THESE CONDITIONS IS A CRIME. If you violate any of these conditions the court may send you to jail or keep you in jail and you may be charged with new crimes. You must follow these conditions until your case is closed or until the court changes the conditions.

Order of the Court:

Presiding Judge/Clerk <b>Laurie Canty</b>	Date <b>3/30/11</b>
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I have received a copy of this order. I have read it. I understand it.

Defendant	Date	Time AM PM
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Form No. 366

STATE OF VERMONT  
ORDER FOR INPATIENT PSYCHIATRIC EXAMINATION  
[www.vermontjudiciary.org](http://www.vermontjudiciary.org)

District Court of Vermont	Unit No. II	Circuit Rutland	Docket No. 448-3-11Rdcr
Defendant Robert Zorn	Offense Simple Assault, Resisting Arrest		

## I. Order for Examination Pursuant to 13 V.S.A. §4814

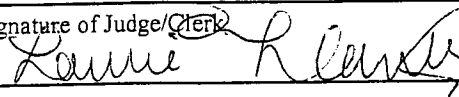
- ☒ A. It is hereby ordered that a psychiatric examination of the above-named defendant be conducted to determine if the defendant is **MENTALLY COMPETENT TO STAND TRIAL** for the alleged offense. The examining doctor shall make a written report to this court and the parties listed in Section 11 of this order no later than 14 days from the date of this order.

- ☒ B. A motion has been made by State for a psychiatric examination of the defendant. It is hereby ordered that the defendant be examined to determine if  
(1) **THE DEFENDANT WAS INSANE AT THE TIME OF THE ALLEGED OFFENSE** and  
(2) **S/HE HAD THE MENTAL STATE REQUIRED** for the offense charged.

The examining doctor shall make a written report to the parties listed in Section 11 of this Order no later than 14 days from the date of this order.

The defendant is committed to the care and custody of the Department of Mental Health at the Vermont State Hospital for the purpose of conducting this examination, for a period not to exceed 30 days from the date of this order. The Sheriff shall transport the defendant to the Vermont State Hospital for this examination. The defendant may be returned as soon as the examination has been completed and shall be returned at the expiration of 30 days from the date of this order, to the custody of the Department of Corrections, or if s/he is admitted to bail, released from custody subject to conditions of bail.

## By Order of the Court:

Date 3/31/11	Signature of Judge/Clerk 
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## II. Distribution of Copies - Copies of the examination report shall be mailed to the following parties:

District Court of Vermont Rutland Criminal Division	Address 9 Merchants Row, Rutland, VT 05701
State's Attorney Marc Brierre, Esq.	Address Asa Bloomer Bldg., Merchants Row, Rutland
Defendant's Attorney Robb Spensley, Esq.	Address State Street, Rutland, VT 05701

- III. A Notice of Hearing on the results of the examination will be sent to all parties. If the defendant is found incompetent, a hospitalization hearing will be held immediately following the competency exam.

- IV. Order to Extend Evaluation Period - Pursuant to 13 V.S.A. § 4815 (c), it is hereby ordered that the defendant named above be committed to the care and custody of the Department of Mental Health at the Vermont State Hospital for the purpose of conducting this examination for an additional period of time, not to exceed fifteen days from the expiration date of the above order.

Date	Judge's Signature
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## Officer's Return

By authority of this Order, on \_\_\_\_\_ I took the within named person from the \_\_\_\_\_ to the Vermont State Hospital at Waterbury, VT.

Date

Officer's Signature

PETER SHUMLIN  
Governor



State of Vermont  
OFFICE OF THE GOVERNOR

May 20, 2011

Robert Zorn  
652 South Street  
Middletown Springs, Vermont 05757

Dear Robert,

Thank you for your correspondence. The Agency of Human Services oversees the Vermont State Hospital and is equipped to address your specific concerns, and we have forwarded your letter to Secretary Doug Racine. His office will be in touch with you regarding these matters.

We will keep your concerns in mind as we press forward on VSH issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Spaulding".

Susan Spaulding  
Director of Constituent Services

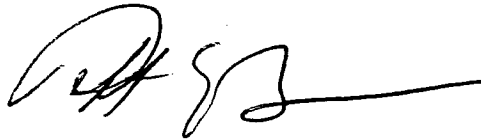
cc: Doug Racine, Secretary of Human Services

ROBERT E ZORN  
652 south st MIDDLETOWN SPRINGS VT  
05757  
july 11 2011

TOWN OF MIDDLETOWN SPRINGS VT  
BOARD OF CIVIL AUTHORITY AND SELECTBOARD

THIS LETTER IS TO STATE THAT ON july 11 2011  
ROBERT E ZORN ACCEPTS THE POSITION OF GRAND JUROR OF  
~~GRAND JURY~~ MIDDLETOWN SPRINGS VERMONT RUTLAND COUNTY  
TOWN OF MIDDLETOWN SPRINGS VERMONT

SINCE THE POSITION NO ONE APPLIED FOR  
PRIOR UNDER THE VOTERS RIGHT ACT  
ROBERT E ZORN GRACIOUSLY ACCEPTS THE POSITION  
AN UNDER EQUAL PROTECTION OF LAWS PERTAINING  
TO MANDATE RULE



*Received for consideration on - July 6, 2011 -  
Laura Castle,  
Town Clerk -*

*Received July 11, 2011.*

Vermont Superior Court  
Superior Court Rutland Criminal Division

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A P P E A R A N C E   B O N D

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Robert E. Zorn  
652 South Street  
Middletown Springs VT 05757

Date of Order: June 13, 2011

State v. Zorn, Robert E.

448-3-11 Rdcr, count 1 ASSAULT-SIMPLE  
13V1023(a)(1)  
448-3-11 Rdcr, count 2 RESISTING ARREST #1  
13V3017(a)(1)

You must give the court a Surety Bond or cash in the amount of \$10000.00.

I am the defendant in this case and I reside at the address listed above. As required by T13, Section 7551 and by my signature, I agree to appear at all required Court proceedings scheduled in this case for which I or my attorney receive notice. I have been given a copy of the conditions of release and agree to obey all the conditions listed. I understand that if I fail to appear or violate any other conditions of my release, an arrest warrant may be issued, new charges may be filed, and/or conditions of release may be changed. I also understand that failure to appear at my required court proceeding or as otherwise required by the conditions of my release can result in imprisonment of not more than two (2) years and a fine of not more than \$5,000 under T.13, Section 7559(d).

SURETY BOND

I acknowledge and agree to the terms listed above. In order to obtain my release a person has agreed to be responsible for guaranteeing my appearance in Court by depositing a \$10000.00 surety bond with sufficient sureties with the Clerk of the Court.

If I appear before this Court at all required proceedings when I am ordered to do so, then, upon the completion of sentencing and after I surrender myself to serve any sentence I may receive, this bond will be void and any deposit will be returned to me, unless this Court orders otherwise.

Date: June 13, 2011 Signature of Defendant: [Signature]

Vermont Superior Court  
Superior Court Rutland Criminal Division

AMENDED CONDITIONS OF RELEASE

Date of Order: June 15, 2011

State v. Zorn, Robert E.

Defendant's Date of Birth: 08/25/1951

448-3-11 Rdcr, count 1 ASSAULT-SIMPLE

13V1023(a)(1)

448-3-11 Rdcr, count 2 RESISTING ARREST #1

13V3017(a)(1)

Arresting Agency: VSP-Rutland

The Court has determined that future appearance(s) of the defendant will not be reasonably assured by his or her release on personal recognizance or execution of an unsecured appearance bond alone; or that the release of the defendant will constitute a danger to the public. It is therefore ORDERED that the defendant be released upon the following conditions:

You must give the court a Surety Bond or cash in the amount of \$10000.00.

In addition:

1. You must come to court when you are told to.
  2. You must give your attorney or the court clerk your address and phone number. If it changes, you must tell them immediately.
  3. You must not be charged with or have probable cause found for a new offense while this case is open.
  4. Curfew: at residence of 552 South Street, Middletown Springs, VT the house with three stories and the green stand and green roof between the hours of 10:00 p.m. to 6:00 a.m.
  5. You must NOT buy, have or use any firearms or dangerous/dangerous weapons.
  6. You must NOT have contact with:  
Mr. Gordon and Wife and Catherine Thomas  
This includes in person, in writing, by telephone, by e-mail or through a third person regardless of whether you are in jail or released.
  7. You must NOT abuse or harass in any way  
those listed in condition 6  
regardless of whether you are in jail or released.
  8. You may be arrested without a warrant if you do not follow by condition(s) No. 1, 2, 3, 4, 5, 6, 7, 8.
  9. You shall not enter the lands or premises of the home, school or workplace of a person named in Condition 6.
  10. Violation of condition 10 may contact Mr. Gordon in writing in relation to finding child abuse in Rutland and Washington counties.
  11. You shall not enter upon the lands of Mr. Fisher and Family Vermont.
- VIOLATION OF ANY OF THESE CONDITIONS IS A CRIME. If you violate any of these conditions the court may send you to jail or you may be charged with new crimes. You must follow these conditions until you are told to stop. If you do not follow these conditions, the court may change the conditions.

WITNESSED BY THE COURT:

# Assault suspect in state hospital

BY BRENT CURTIS  
STAFF WRITER

A Middletown Springs man who ran for three elected positions in town two years ago has been charged with a pair of crimes and been sent to the state hospital for a mental health evaluation. Robert E. Zorn, 59, pleaded innocent in Rutland criminal court to Thursday charges of simple assault and resisting arrest stemming from an incident Wednesday in which Zorn allegedly punched a Danby lawyer.

But while charged only with misdemeanor, Zorn's attorneys, Zorn's family dispute that he's very passionate about his work. The Zorn family dispute that he's very passionate about his work. The Zorn family dispute that he's very passionate about his work.



Zorn

...has run screening. "He's involved in a family dispute that he's very passionate about his work. The Zorn family dispute that he's very passionate about his work. The Zorn family dispute that he's very passionate about his work.

But after reading a police report on Zorn's arrest, Judge Theresa DiMauro agreed to send Zorn for a full psychiatric screening and set bail at \$10,000. Zorn, a former Middle-town Springs selectman and a contender for the select board, road commissioner and town constable in 2009, was arrested Wednesday afternoon shortly after an incident that took place in

See Suspect, Page B4

## gford principal

Morse added the staff was always willing to take on district directives with full force. "We have a couple of new initiatives happening next year that they're putting all their energy into and

## Suspect

Continued from B1

the office of Danby lawyer Herb Ogden.

Ogden, who is representing Zorn's brother in a legal dispute with Zorn, told police that Zorn arrived unexpectedly at his Main Street office at about 3 p.m. Wednesday. Police said Zorn walked up to Ogden, demanded money he said was owed to him and punched the

lawyer in the jaw. Ogden told police when he stood up from his desk, Zorn grabbed him, held his hands behind his back and told him he was "under arrest."

Ogden said he demanded that Zorn leave the office — something he eventually did, police said. State police were called and located Zorn driving his truck on South Main Street, where two cruisers stopped the vehicle and ordered Zorn at gunpoint

to lay down face first on the ground. But police say Zorn refused to follow their commands and then lay on his hand while officers tried to handcuff him.

Police said they used an electronic Taser on Zorn, who complied with their orders afterward. In Zorn's truck, police said they found a 30.06 hunting rifle and a Mini 14 semi-automatic rifle along with ammunition. [brentcurtis@rutlandherald.com](mailto:brentcurtis@rutlandherald.com)

# Local & State

■ Rutland County ■ Middlebury

Rutland Daily Herald | Friday, April 1, 2011



RE: Robert Zorn  
Date of Examination: April 6, 2011  
Page 1

**Paul G. Cotton, M.D., P.C.**  
186 South Willard Street  
Burlington, Vermont 05401

—  
Telephone (802) 860-0163 Facsimile (802) 860-0164  
E-Mail: [Paul.Cotton@uvm.edu](mailto:Paul.Cotton@uvm.edu)

April 6, 2011

Rutland Superior Court-Criminal Division  
9 Merchant's Row  
Rutland, VT 05701

**RE: Robert Zorn (DOB: 8/25/51)**  
**Docket No: 448-3-11 RdCr**

Your Honor:

At your request and pursuant to the order for inpatient psychiatric examination, I re-examined Robert Zorn on April 6, 2011, at Vermont State Hospital, to determine whether he was insane and/or had the mental state required for the offenses charged of Simple Assault and Resisting Arrest, and to determine if he is competent to stand trial for the offenses charged.

**Database:**

1. Examination of Robert Zorn on 3/16/11 at Vermont State Hospital for 1.50 hours.
2. Information by state's attorney, dated 3/31/11.
3. Affidavit of Vermont State Police Trooper Robert Rider, dated 3/30/11 and Supplemental Affidavit of Trooper Casey J. Daniell, dated 3/30/11.
4. Vermont criminal history, Windsor Superior Court decision of Judge Mary Miles Teachout, dated 10/6/08.
5. VSH medical record.

**Non-Confidentiality Warning:**

Prior to beginning the evaluation, I informed Robert Zorn that I am a psychiatrist who had been retained by the court for the purpose of gathering information regarding the circumstances of his charges of Simple Assault and Resisting Arrest. I informed him that what he said could be used to determine his competency to participate in proceedings and could be included in my written report or in oral testimony. He was informed that his participation was voluntary. He understood and wished to proceed.